

# **Environmental Performance Partnership Agreement**

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A Strategic Partnership between U.S. EPA  
Region 5 and the Indiana Department of  
Environmental Management





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## Section

## 1

# General Purpose and Context

The Indiana Department of Environmental Management (IDEM) is entering its sixth year with the National Environmental Performance Partnership System, or NEPPS. This system was created on May 17, 1995, when the U.S. Environmental Protection Agency (US EPA) Administrator Carol Browner and state representatives signed a "Joint Commitment to Reform Oversight and Create a National Environmental Performance Partnership System." This system recognizes two decades of environmental progress in the United States, but acknowledges that we must modify existing policies and management approaches to address our most pervasive and difficult to solve problems. Through NEPPS, US EPA and states work together to monitor environmental conditions and to develop innovative approaches to improve the quality of our nation's air, water and land. NEPPS also provides states with greater flexibility to achieve results while maintaining accountability for meeting national standards.

**NEPPS consists of:**

- Increased use of environmental goals and indicators,
- Self assessment by states of program accomplishments and barriers,
- Environmental Performance Partnership Agreements (EnPPA) between states and US EPA Regions,
- Reduced oversight and increased flexibility for states that demonstrate strong performance,
- Public outreach to increase awareness of environmental conditions and public involvement in setting goals and objectives,
- Joint US EPA and state evaluation of the new system.

This Environmental Performance Partnership Agreement (EnPPA) was created through a joint planning and priority setting dialogue between IDEM and US EPA Region 5, informed both by feedback from Indiana citizens and directions set by US EPA national, regional and state program managers. Through this agreement, we hope to continuously improve the US EPA IDEM relationship and our systems for managing environmental programs.

**The agreement is based on several underlying assumptions:**

- US EPA should rely on the states to manage environmental programs delegated to the states.
- States and US EPA should incorporate the public's ideas and concerns into our priority setting and planning.
- We should strive continuously to improve the products and services we provide.
- We must be accountable to stakeholders and communities who have a right to expect timeliness, efficiency, professionalism, and progress toward improved environmental conditions.
- We should maximize each other's strengths and eliminate duplication of effort to ensure the wisest use of public resources.
- States and communities must be afforded greater flexibility, as allowed by law, in applying rules and guidance to meet national goals and standards.

- The federal government retains a vital responsibility to ensure consistent implementation and enforcement of national laws, regulations and standards, and for ensuring that states provide fundamental public health and environmental protection to their citizens and those downwind and downstream.
- Maximize the use of environmental measures to gauge the success of work, and in turn use the results for management decisions.
- The work should be based on assessed environmental conditions with program resources managed to address areas which need attention.

US EPA has agreed to work with all states, using the new environmental performance partnership system, to reach agreements that are based increasingly on an assessment of the environmental conditions and needs in each state.

Environmental indicators, program performance measures, and reporting requirements will be used both to measure the fulfillment of state and US EPA Region 5 commitments under this agreement and to provide data to analyze the effectiveness of different approaches to environmental protection. US EPA Region 5 will monitor IDEM's basic program performance and fiscal responsibilities, as required by law. However, a basic goal of this agreement is to shift the primary focus of the US EPA Region 5 IDEM dialogue away from measuring activities and toward identifying and solving environmental problems.

This agreement is a part of a continuing cooperative effort between IDEM and US EPA Region 5 to work through the details of this significant cultural and institutional change in how we work with each other to protect Indiana's environment.

### **Scope of the Agreement**

This agreement will be in effect from the signature date through June 30, 2003. This agreement describes all IDEM programs that provide environmental protection to Indiana citizens, whether or not they are funded or mandated by US EPA. Federal funding makes up about 25% of IDEM's overall budget. By including priorities for all IDEM programs, regardless of funding source, we are able to give Indiana citizens a broader picture of our efforts to protect and clean up Indiana's environment. US EPA Region 5's traditional oversight role, however, is limited to those programs carried out under the federal statutes and programs listed below:

- Clean Air Act
- Clean Water Act
- Surface Water Protection
- Ground Water Protection
- Wetlands
- Safe Drinking Water Act
- Public Drinking Water
- Solid Waste Disposal Act
- Resource Conservation and Recovery Act
- Underground Storage Tanks
- Hazardous Waste Management
- Solid Waste Management
- Comprehensive Environmental Response, Compensation and Liability Act
- Superfund Amendments and Reauthorization Act



- Toxic Substances Control Act
- Asbestos Hazard Emergency Response Act

The agreement serves as IDEM's work plan for the following grants:

- air pollution control,
- asbestos hazard emergency response (AHERA),
- public water system supervision,
- water pollution control,
- hazardous waste management, and
- underground storage tank (UST).

US EPA Region 5 and IDEM have attempted to provide a description of each agency's environmental protection activities for the period of this agreement. In most instances, IDEM's measures for determining success in accomplishing its priorities establish a June 30, 2003 date or earlier for completion. IDEM's strategic goals, objectives and priorities are anticipated to remain the same throughout the term of this agreement. IDEM will update the measures used to judge success of these priorities prior to June 30, 2003. Upon approval by the Office of the Regional Administrator, these updated measures will be incorporated into this agreement by amendment. US EPA may invoke the dispute mechanism and ultimately terminate this agreement if updated measures are not approved by US EPA. In addition, there may be other environmental problems warranting action that neither agency contemplates at this time. US EPA Region 5 and IDEM agree to coordinate our activities during the agreement period to avoid overlap and duplication of effort in addressing new concerns and issues that arise. Furthermore, we recognize that this agreement does not necessarily encompass every relationship between IDEM and US EPA Region 5, and that some agreements and relationships will be described in program specific documents elsewhere. Agreements that are in place between US EPA Region 5 and other Indiana state agencies are not included in this agreement. This agreement does not replace or supersede statutes, regulations, or delegation agreements entered into previously with the state.



## I. Indiana's Environmental / Strategic Goals

This Agreement is based on the following environmental and strategic goals for Indiana:

- Prevent Pollution
- Reduce Toxic Releases
- Improve Indiana's Air Quality
- Focus on Water Quality
- Restore and Protect Indiana's Surface Water
- Protect Indiana's Ground Water
- Ensure Safe Drinking Water
- Focus on Northwest Indiana
- Reduce and Safely Manage Waste
- Clean Up Contaminated Sites
- Continuously Improve IDEM
- Promote Environmental Justice
- Improve Communication with Communities
- Protecting Children from Environmental Threats

These goals provide the broad framework, which describes all the major activities IDEM undertakes to protect public health and improve Indiana's environment. IDEM has developed environmental/strategic goals to make the agency more effective, proactive, and forward looking. The goals are translated into more specific objectives, which in turn guide the Department's day-to-day activities. IDEM's goals, objectives and activities are constantly being refocused to meet changing situations. The Strategic Goals and Objectives have been reviewed and updated for this Agreement. IDEM has and will continue to report on its progress in achieving these long-term goals in "Indiana's Annual State of the Environment Report" (on the internet at <http://www.in.gov/idem/soe/index.html>), the IDEM Annual Report (on the Internet at <http://www.in.gov/idem/annualreports/index.html>), and in other publications, many of which will be available from the IDEM website at <http://www.IN.gov/idem>.

### 2001-2003 Strategic Goals and Objectives:

#### 1. Prevent Pollution

**Vision:** All Indiana organizations use pollution prevention techniques as the preferred method for protecting the environment.

#### Environmental Objectives:

- Reduce environmental waste generation - Indiana organizations that use significant quantities of toxic chemicals reduce the amount of these chemicals in their environmental waste.
- Integrate pollution prevention into business plans - Indiana organizations that generate significant quantities of environmental wastes voluntarily integrate pollution prevention into their business plans and compliance activities.

## **2. Reduce Toxic Releases**

**Vision:** Toxic releases into our environment are reduced to the greatest extent possible.

### **Environmental Objectives:**

- Organizations that use significant quantities of toxic chemicals will reduce toxic chemical releases to the environment (excluding disposal in a permitted facility).
- Reduce mercury contamination - Fish tissues will contain an average of 20 percent less mercury by 2007 when compared to 1996 levels.
- Reduce the contamination from lead, asbestos and polychlorinated biphenyls - The release of lead, asbestos and PCBs will be reduced to the greatest extent practical.

## **3. Improve Indiana's Air Quality**

**Vision:** All of Indiana's air meets state and federal health-based air quality standards.

### **Environmental Objectives:**

- By the year 2007, citizens in Northwest Indiana will have air that meets the 0.12 part per million National Ambient Air Quality Standards (NAAQS) for ozone.
- By the year 2003, air quality in Clark and Floyd will meet the 0.12 part per million National Ambient Air Quality Standards (NAAQS) for ozone.
- Positively and aggressively maintain air quality for that portion of Indiana's population living in areas where air quality meets health-based standards.
- By 2000, transport and regional Nox pollution issues will be addressed in a state/regional pollution reduction plan.
- The new National Ambient Air Quality standards for ozone and particulate matter will be met in all areas of the state by the deadlines established by US EPA (depending on the outcome of pending federal litigation and future regulatory action).
- Positively and aggressively maintain air quality for that portion of Indiana's population living in areas designated as ozone maintenance areas.

## **4. Restore and Protect Indiana's Surface Water**

**Vision:** Indiana's surface waters provide a safe source of water for recreation, aquatic life, and wildlife, as well as for public water supplies.

### **Environmental Objectives:**

- 85 percent of Indiana's surface waters support a well-balanced aquatic community by 2007.
- 40 percent of Indiana's surface waters will support designated recreational uses by 2007.
- Indiana's wetland resources will be increased by 1000 acres by 2007.

## **5. Protect Indiana's Ground Water**

**Vision:** Ensure that Indiana's ground water sources are protected.

### **Environmental Objectives:**

- By 2005, groundwater in 75 percent of the hydrogeologic settings identified as being vulnerable to pesticides, or determined to be susceptible to contamination are protected for beneficial uses.

## **6. Ensure Safe Drinking Water**

**Vision:** All Indiana's drinking water sources are safe, clean, and environmentally sound.

### **Environmental Objectives:**

- By 2005, 99 percent of the population served by public water supply systems will have water that meets Safe Drinking Water standards.

## **7. Focus on Northwest Indiana**

**Vision:** Northwest Indiana's air is safe to breathe; its water is safe for swimmers, fish, wildlife and the public water supply; and its land is restored.

### **Environmental Objectives:**

- Minimize toxic and conventional pollutants into Lake Michigan from the Area of Concern.
- Remediate contaminated sediments in the Grand Calumet River and the Indiana Harbor Ship Canal within the Area of Concern as defined by the International Joint Commission.
- Remediate, restore, and protect the stable, healthy and viable ecosystem in the Area of Concern.
- Facilitate and implement community based environmental protection, incorporating partnerships with stakeholders.

## **8. Reduce and Safely Manage Waste**

**Vision:** Minimize waste disposal while assuring proper management and handling of wastes.

### **Strategic Objectives:**

- Improve waste handling and management practices.
- Reduce land disposal of hazardous waste by maximizing the implementation of the pollution prevention hierarchy of reduce, reclaim and treat.
- Reduce municipal and non-municipal solid waste final disposal by 50 percent of 1992 total by the year 2001.

## **9. Clean Up Contaminated Sites**

**Vision:** The cleanup of contaminated sites from previous generations is completed and our land and water resources are returned to productive use.

### **Strategic Objectives:**

- Reduce or manage threats to human health and the environment.
- Increase protection and restoration of critical habitat.

## **10. Continuously Improve IDEM**

**Vision:** In all activities, we are fair, consistent, professional, accountable and deserving of the public's trust. We continuously improve the products and services we provide to protect our

environment. IDEM and US EPA Region 5 work in partnership to achieve measurable goals and objectives for Indiana's environment.

**Strategic Objectives:**

- **Increase Efficiency**  
Improve IDEM's administrative effectiveness and efficiency to ensure the best use of the public resources entrusted to the agency.
- **Improve Customer Service**  
IDEM customers will demonstrate increasing satisfaction with the services the agency provides.
- **Manage for Environmental Results**  
IDEM will track environmental progress through indicators summarized in "Indiana's Annual State of the Environment Report" and other publications.

**11. Promote Environmental Justice**

**Vision:** No citizens or communities of the State of Indiana, regardless of race, color, national origin, income, or geographic location, will bear a disproportionate share of the risk and consequences of environmental pollution or will be denied equal access to environmental benefits.

**Strategic Objectives:**

- **GIS Mapping**  
Develop and utilize the ability to create maps for Indiana communities which overlay geographical information with demographic information.
- **Education of Communities**  
Develop and publish Citizen's Guides to Permitting, Rulemaking, and Clean-ups to use as a tool to educate communities about IDEM's roles and responsibilities and how the Agency can help them become involved in environmental decision making.
- **Education of Staff**  
Develop and utilize training modules to educate our staff to be sensitive to Environmental Justice issues and to understand the relevance of such issues to their work.
- **Stakeholder Input into Permitting Decisions**  
IDEM will establish a protocol for facilitating or mediating environmental disputes "up-front."
- **Enhance Public Participation Opportunities**  
During the course of developing the Citizen's Guides, IDEM will analyze our existing public participation processes and develop and implement improvements to those processes.
- **Involve Other Agencies**  
IDEM will seek out and involve any and all relevant agencies in our Environmental Justice efforts.
- **Community Input into the Implementation of the Strategic Plan**  
IDEM will maintain both an Agency Environmental Justice contact as well as an advisory group to ensure ongoing viability of our Environmental Justice efforts.

**12. Improve Communication with Communities**

**Vision:** Give communities the environmental information they need in easily accessible, easy-to-understand formats. Obtaining feedback regarding the type of information communities need and how to best disseminate it.

**Strategic Objectives:**

- Making information available
  - Develop fact sheets in plain English, and disseminate the information via the web as well as other avenues.
  - Provide translation service for staff, when the use of Spanish or another language is required.
  - Implement a standard method for responding to requests for records, and train staff accordingly.
- Education/Outreach
  - Determine the need and possible use of a mobile classroom.
  - Develop presentations to teach children about their own environmental impacts.
- Environmental Justice
  - Develop presentations and work with communities to schedule workshops for the public.
  - Provide affected parties with an opportunity to give their input and state any concerns they may have.
- Internal Information Integration
  - Revise and expand on-line permitting applications.
  - Develop a plan to integrate existing databases into a multi-media system.
- Educate IDEM Staff  
Provide training on multimedia topics and on organizing and holding public meetings.

### **13. Protecting Children from Environmental Threats**

**Vision:** Focus on children's health and enhance the protection we provide to our children.

**Strategic Objectives:**

- Address environmental threats in schools and child care facilities.
  - Continue to work on Integrated Pest Management (IPM) programs.
  - Develop a draft IPM curriculum pre K-6.
  - Continue to partner with governmental agencies as well as the private sector.
- Asthma  
Develop educational materials on environmental triggers for asthma, and continue to educate parents on this topic. Once finalized, IDEM will analyze the asthma study being conducted by the Hoosier Environmental Council and will develop a plan to distribute the information.
- Tools for Schools

- Continue to partner with EPA to promote the Tools for Schools curriculum in 20 schools or school districts.
- Draft a curriculum for pre K-6.
- Investigate the possibility of expanding this program to child care facilities.
- Lead
  - Complete the summary and assessments of data from the 2000 Safer Families Project. Present results of the data to various groups.
  - Continue to partner with Indiana's Family and Social Services Agency and local health departments throughout the state. Provide free lead risk assessment training to health departments that have not yet received this training.



## **II. Indiana's Priorities**

### **IDEM Agency-Wide Priorities**

Within IDEM's Strategic Goals and Objectives goals, we have identified four agency-wide priorities on which IDEM will focus during the next two years. These priorities are:

#### **Focus on Water Quality**

- Promote Watershed Approach
- Wet Weather / Stormwater
- Smaller System Compliance Strategy
- Implement Water Quality Standards (WQS)
- Protecting Wetlands
- Increase Focus on Groundwater Protection
- Retain Primacy for Safe Drinking Water Act Program

#### **Reduce Toxics**

- Planning, Assessment, and Coordination of Toxics Reduction Efforts
- Implement Toxic Reduction Programs
- Protect Children's Health

#### **Communicating with Communities**

- Making Information Available
- Education/Outreach
- Internal Information Integration

#### **Building a Better IDEM**

- "Trains Run On Time" - Meeting deadlines, eliminating backlogs, and streamlining internal processes relating to Permitting, Compliance, Rules "Sunsets", and Remediation efforts.
- "Innovative and Smart" - Promote innovations and improve environmental management practices.
- Workforce Improvements



## 1. FOCUS ON WATER QUALITY

### Sponsor

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### Introduction

The quality of Indiana's surface water and drinking water has vastly improved in the past few decades. However, Indiana has 208 documented impaired waterbodies and some streams have yet to be adequately characterized. Indiana still has some drinking water providers that do not provide safe water 100% of the time. Also, Indiana has lost about 85% of the valuable wetlands that serve to enhance water quality.

The government and private sector continue to invest billions of dollars and much time and attention to water quality issues in Indiana. This focus is warranted and supports the inclusion of a focus on water quality as an agency-wide priority.

A number of stresses contribute to existing water quality problems:

- The infrastructure for proper handling and treatment of our wastewater and our drinking water continues to need upgrading and reinvestment.
- Antiquated combined sewer overflow systems continue to discharge untreated wastewater.
- The stresses of growth in both our urban and rural areas tax existing systems and create new threats to surface and groundwater.
- Pipe discharges to our streams have been effectively controlled but, as science and technology evolves, further reductions in toxic pollution are possible.
- Runoff from urban areas, agricultural activities and other human activities continues to contribute significantly to existing water quality problems.
- Air deposition of contaminants such as mercury and nitrogen continue to threaten the quality of water bodies.
- Some smaller drinking water systems may not adequately test or treat their drinking water provided to the public.
- A recent federal court decision removed a significant percent of Indiana's wetlands from federal jurisdiction.

### A. Promote Watershed Approach

#### 1) *Develop Basin Coordination Resource Approach*

By: August 1, 2001

#### 2) *Approval of 6-Basin Coordinator staffing Approach*

By: October 1, 2001

**3) Complete TMDLs scheduled for 2002 and 2003 and submit to EPA**

**Measures:**

- FY 2002: 5 segments in the Grand Cal/Indiana Harbor Ship Canal
- FY 2003: 13 segments (contracting)
- Fall Creek - 1 impairment
- Pleasant Run - 1 impairment
- 3 segments White River in Marion County - 3 impairments
- The Kankakee River - 1 impairment
- 3 segments of the Little Calumet - 4 impairments
- Burns Ditch - 1 impairment
- Salt Creek - 1 impairment
- Lake Michigan Shoreline - 1 impairment
- Trail Creek - 1 impairment

By: June 30, 2003

**4) TMDL listing and de-listing rule adopted and implemented**

By: January 1, 2003

**5) Consider and implement selected suggestions proposed by the TMDL Advisory Group**

By: June 30, 2003

**6) IDEM water quality monitoring strategy**

Update and revise IDEM's water quality monitoring strategy to conform to US EPA's new guidance of 10 elements of an adequate state ambient water monitoring and assessment program

By: June 30, 2003

**7) Review watershed approach progress and identify next steps**

By: June 30, 2003

a) Review Draft Watershed Framework, dated May, 2000

By: January 1, 2003

b) Evaluate Progress Toward Watershed Approach

By: March 1, 2003

c) Make Recommendations for Next Steps

By: June 30, 2003

**B. Wet Weather**

**1) All 105 CSO communities with CSO LTCP (Long Term Control Plan) required in NPDES permit**

By: January 1, 2002

**2) Develop LTCP review protocol and checklist**

By: October 1, 2001

**3) Implement the LTCP review process for all LTCPs**

By: December 1, 2001

**4) Audit 24 CSO communities on LTCP implementation**

By: January 1, 2003

**5) MS4-Phase II Storm Water Rule implemented**

By: March 31, 2003

**6) Complete and Implement Overloaded Facilities Policy**

By: September 1, 2001

**7) Complete CSO Notification Rulemaking**

By: May 1, 2002

**C. Smaller System Compliance Strategy****1) Develop Small Operations Strategy (SOS) Plan to identify and evaluate systems with operational and compliance problems.**

By: October 1, 2001

**2) Screen and prioritize systems with identified problems based on health and environmental problems.**

By: October 1, 2001

**3) Identify and develop tools to be used in assisting small systems including financial, management and technical components. Also, develop criteria and source for the Financial Assistance Fund.**

By: December 1, 2001

**4) Develop system to quantify health and environmental improvements, to target appropriate facilities for compliance efforts and a targeted number for assistance efforts.**

By: December 1, 2001

**5) Assist at least 36 small systems in water, wastewater or both.**

By: June 30, 2003

**D. Implement WQS for Point Sources and Update/Revise WQS per SEA 431 and Triennial Review****1) Finalize schedule for NPDES decisions**

By: July 1, 2001

**2) *Revise necessary NPDES permit issuance policies***

By: October 1, 2001

**3) *Develop Workplan for SEA 431 and Triennial Review Rules***

By: September 1, 2001

**4) *Implement Rules Work schedule and Complete***

By: June 30, 2003

**5) *Develop new NPDES reporting database to reduce reliance on federal PCS***

By: January 1, 2003

**6) *Implement new NPDES reporting database***

By: June 30, 2003

**E. Protecting Wetlands**

**1) *Develop rule language for State Wetlands Permit***

By: September 1, 2001

**2) *Adopt and Implement new Wetland WQS, State permit and 401 WQC***

By: January 1, 2002

**3) *Develop and Implement Wetland Compliance and Enforcement Plan***

By: January 1, 2002

**4) *Develop Wetlands Monitoring Strategy***

By: June 30, 2002

**F. Increase Focus on Groundwater Protection**

**1) *Request adoption of GWQS***

By: July 1, 2001

**2) *Develop a process to evaluate IDEM programs for implementation of the GWQS***

By: December 1, 2001

**3) *Begin implementation of process for integration of the GWQS into IDEM program rulemaking***

By: January 1, 2002

**4) Analyze existing data to develop groundwater monitoring strategy**

By: March 1, 2002

**5) Work with GWTF to coordinate application of IDEM process to implement the GWQS into ground water programs of other state agencies**

By: December 1, 2002

**G. Retain Primacy for Safe Drinking Water Act Program****1) Source Water Assessment reviews - 3600 PWS Completed**By: June 6, 2004  
(2000 completed By: June 30, 2003)**2) Wellhead Protection Reviews - 200 completed**

By: June 1, 2002

**3) Develop DW Staffing Package**

By: July 1, 2001

**4) Approval of DW Staffing Package**

By: October 1, 2001

**5) Implement Capacity Development for 50 community systems**

By: June 30, 2002

**6) Adopt and implement new rules under the Safe drinking Water Act**

Complete within 2 year primacy extension.





## 2. REDUCE TOXICS

### Priority Leads

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### Introduction

The presence of toxic chemicals in our air, water and land is a direct threat to human health, especially our children's, whose behaviors and developing bodies make them more vulnerable to the effects of harmful chemicals. Working with those who want to do their part for the environment and taking enforcement action against those who do not, we have significantly reduced the amount of toxics in our environment in recent years. Our goal is to accelerate that progress by planning and assessing the toxics work done throughout Indiana, focusing on specific Indiana pollutants in relation to geographic areas of the State where toxic loadings are high, further implementing toxic reduction programs, and focusing on children's' environment.

### A. Planning & Assessment

#### 1) *Toxics reduction efforts coordination*

Develop internal agency structure to coordinate toxics reduction efforts across the agency, including forming a "risk advisory committee" and designating a lead staff person.

By: September 1, 2001

#### 2) *Address specific pollutants*

Identify pollutants that pose risks to public health and the environment through a cross-media review, and identify agency initiatives to address them.

- a) Conduct integrated analysis of results of ToxWatch study, National Air Toxics Assessment, Cumulative Risk Initiative, Toxics Release Inventory, Office of Water Quality metals sampling and other screening tools to identify pollutants, industries, or geographic areas of concern.

By: June 1, 2002

- b) Develop and implement agency initiatives to address sources of such pollutants, using pollution prevention, technical assistance, rule changes, compliance, and the other available tools.

By: June 1 2003

#### 3) *Mercury Assessment and Evaluation*

- a) Using assessment tools such as data gathering and analysis, provide valuable/key information to IDEM's mercury water quality planning efforts as part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, fish tissue sampling data and other efforts identified below in (b).

By: December 31, 2002 / June 30, 2003

- b) Research available information and identify key mercury contributors in Indiana and assemble best available mercury inventory. Each office will assume lead for air, water and land releases respectively.

By: December 31, 2002

- c) Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

- (1) Develop interim goal

By: June 30, 2002

- (2) Develop final strategy

By: June 30, 2003

- d) Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Ongoing: — Through June 30, 2003

#### **4) Conduct ambient air monitoring for toxics**

- a) Continue permanent urban air toxics monitoring sites, using TO15 analyst list.

Deadline: ongoing

- b) Complete toxics “supersite” at Indianapolis Washington Park monitoring station.

By: December 31, 2001

- c) Implement further monitoring efforts upon final recommendations from ATAG and review of information identified through b) above.

By: To be determined.

### **B. Implement Toxic Reduction Programs**

#### **1) TRI**

Develop pollution prevention, assistance and compliance/enforcement strategy for major TRI increases, focusing top reporters and top reported chemicals; prioritize TRI reported substances for future regulatory and non-regulatory considerations; and evaluate compliance of TRI reporters.

By: June 30, 2002

#### **2) Fiberglass and reinforced plastic manufacturing Compliance and Enforcement Efforts**

- a) Identify and inspect at least 15 sources that have not notified of compliance with the styrene rule and target those sources for inspection in the Northern Regional Office area.

- (1) Identify sources

By: January 30, 2002

- (2) Complete inspections

By: June 30, 2002

- b) Coordinate an enforcement strategy for non-compliance with the styrene rule that would include development of Compliance/Enforcement Referral Guidance and potential enforcement strategies.

By: January 30, 2002

**3) Outreach and compliance programs for Public Water Supply Systems**

Implement outreach and compliance programs for Public Water Supply Systems on all Drinking Water toxics rules with emphasis on new rules on lead and copper to ensure that the requirements, including monitoring, are understood and met.

By: June 30, 2002

**4) Develop and implement a radon awareness program**

- a) Develop a plan to improve data management.

By: November 30, 2001

- b) With stakeholder input, develop two-year plan for radon awareness program.

By: June 30, 2003

**5) BP Amoco Consent Decree settlement dollars**

With public input, determine projects for spending BP Amoco Consent Decree settlement dollars. Develop implementation schedules and implement according to schedule.

By: January 31, 2002

**6) Cumulative Risk Initiative (CRI)**

Work with USEPA to complete the Cumulative Risk Initiative (CRI). Using CRI data about air quality in Lake County, explore the possibility of targeted voluntary emission reductions from local industries.

By: June 30, 2002

**7) Lake County Lead Abatement Task Force**

Help the Lake County Lead Task Force provide education and outreach to the community. Present training opportunities to health departments and contractors regarding interim controls and case management.

By: June 30, 2002

**8) Northwest Indiana Diesel Initiative**

- a) Produce report of activities to date, including results of recent survey and recommend next steps.

By: August 31, 2001

- b) Participate in coordinated effort between the Northwest Diesel Workgroup and U.S. EPA's diesel initiative, and report on status quarterly.

Ongoing

**C. Protect Children's Health**

**1) Integrated Pest Management**

- a) Finish pilot program with childcare facilities and schools.  
By: December 31, 2001
- b) Publish the final report of the pilot facilities.  
By: June 30, 2002
- c) Implement the models at schools and childcare facilities.  
By: June 30, 2003
- d) Develop an outreach plan to reach additional childcare facilities on implementing IPM.  
By: June 30, 2002
- e) Implement the outreach plan to reach additional childcare facilities on implementing IPM.  
By: June 30, 2003
- f) Evaluate the possibility of working with Indiana's experts in Turf Management and the Indiana State Chemist's Office to arrange training in schools and childcare facilities on IPM Workshops on the outside of the buildings.  
By: December 31, 2001
- g) Complete three Turf Management and implementing IPM on the outside workshops throughout Indiana.  
By: December 31, 2002
- h) Develop a draft IPM curriculum for children pre K-6. By June 2003, finalize and implement a plan to distribute the curriculum to childcare facilities.  
By: June 30, 2002

## **2) Asthma**

- a) Develop an educational piece with the focus group for parents on the environmental triggers for asthma.  
By: December 31, 2001
- b) Investigate the possibility of a continuing outreach piece addressing some of the environmental triggers of asthma in more detail to be distributed to parents, health care professionals, and schools.  
By: June 30, 2002
- c) Develop two detailed educational pieces for the environmental triggers of asthma.  
By: February 28, 2003
- d) Finish the study of asthma and ozone that the Hoosier Environmental council conducted.  
By: December 31, 2001
- e) Analyze the study and develop a plan to distribute the information.  
By: December 31, 2002

## **3) Lead**

- a) Complete summary and assessment of data collected from the 2000 Safer Families Project and focus outreach efforts on areas on the top ten items to protect your family against lead. Present results of the data to various groups.

By: June 30, 2002

- b) Complete free lead risk assessment training for health departments throughout the state.

By: September 1, 2001

- c) Partner with FSSA on the Windows of Opportunity project and assist where needed.

By: December 31, 2002

**4) *Develop a plan for future children's initiatives***

- a) Working with EPA, IDEM will identify future focus areas and evaluate our level of involvement on both a national, regional and local level.

By: June 30, 2002

- b) Implement new projects of focus.

By: June 30, 2003



### 3. COMMUNICATING WITH COMMUNITIES

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#### Introduction

This priority focuses on enhancing IDEM's efforts and ability to give communities and staff the environmental information they need; putting it in easily accessible, easy-to-understand formats; and getting feedback about what information is needed and how best to disseminate it.

#### A. Making Information Available

##### 1) Agency Records

- a) Implement standard agency method for responding to requests, and begin staff training.

By: December 1, 2001

- b) Monitor success through tracking system to ensure continued timely response.

By: December 1, 2002

##### 2) Bi-Lingual Documents/Interpreters

- a) Provide Simultaneous Translation Service for staff.

By: December 1, 2001

- b) Evaluate additional agency translation needs.

By: March 1, 2002

##### 3) Fact Sheets

Develop standard fact sheets on environmental issues and controversial subjects to be used by the staff as well as the public.

By: June 2002 — 50 facts

##### 4) Feedback

Develop process for receiving comments on the website, bi-lingual services, publications and general services provided by the agency.

By: March 2002

**5) Website**

- a) Continue to track most-requested pages. Develop quarterly report to identify pages recommended for removal, including number of hits per page.

By: December 1, 2001

- b) Create feedback mechanism for improvement

By: December 1, 2001

**B. Education/Outreach**

**1) Speakers Bureau**

- a) Identify staff and stakeholders.

By: December 1, 2001

- b) Develop Marketing Strategy

By: February 1, 2002

- c) Create and schedule first outreach appearances.

By: April 1, 2002

**2) Mobile Classroom**

- a) Evaluate need for and explore possible use of existing vehicles.

By: September 1, 2001

- b) Develop presentations to show children how they affect the environment and how IDEM's work impacts the environment.

By: June 30, 2003

**3) Environmental Justice**

- a) Educate Communities about Environmental Issues, Public Participation, IDEM Roles/Responsibilities.

- (1) Develop presentation module for IDEM and communities to use to educate public

By: August 1, 2001

- (2) Publish guides (internet & print)

By: September 1, 2001

- (3) Implement/ make workshops available

By: October 1, 2001

- b) Develop EJ Training for IDEM

- (1) Perform initial agency-wide EJ training.

By: July 1, 2001

- (2) Initiate formal training.

By: August 1, 2001



- c) Ensure Affected parties have Opportunity to Communicate Concerns in IDEM Decisions. Draft, with affected community input, protocol for IDEM facilitation of environmental disputes.

By: September 1, 2001

## C. Internal Information Integration

### 1) *Shared Drive vs. Intranet*

Evaluate the need for an Intranet system or reorganizing the Shared Drive – Pros, Cons, Cost.

By: December 1, 2001

### 2) *Online Permitting*

- a) Continue working with the program areas to convert agency forms to fillable PDF format. Retain a liaison between State Forms Management and the program areas for the production of new permit application forms, and for the maintenance of revised, Forms Management approved permit application forms.

- b) Revise the following OAQ lead and asbestos permit and license application forms:

- Application for Individual Asbestos License
- Notification of Asbestos Demolition and Renovation Operations
- Application for Individual Lead License
- Notification of Lead Abatement Activity
- Application for Asbestos Contractor License
- Application for Lead Contractor License
- Application for Lead-Based Paint Training Course Provider Approval
- Application for Duplicate Lead License
- Application for Duplicate Asbestos License
- Application for Asbestos Training Course Provider Approval

By: February 1, 2002

- c) Finish the OAQ Title V permit application package (approx 300 pages)

By: June 1, 2002

- d) Revise solid waste permit application forms and form packages, as follows:

- Solid Waste Minor Modification Application Packet-Land Disposal Facilities
- Solid Waste Minor Modification Application Packet-Processing Facilities
- Solid Waste Closure Plan/Post-Closure Plan Forms & Instructions
- Solid Waste Facility Permit Fee Transmittal Form #47215
- Solid Waste Facility Permit Transfer Application
- Municipal Solid Waste Transfer Activities Disclosure Statement SWF-16

By: August 1, 2002

- e) Revise the following miscellaneous OLQ permit application forms:

- Wastewater Disposal Permits (3 types)

- Land Application - Site Permit
- Land Application - Marketing & Distribution Permit
- Off-Site Storage for Biosolids and Industrial Wastes
- Agricultural Lime Substitution
- Solid Waste Minor Mod for Land Disposal
- Solid Waste Minor Mod for Processing Facilities
- Waste Tire Transporters
- Confined Feeding
- Waste Tire Processors
- Waste Tire Storage

By: January 1, 2003

f) Revise the following miscellaneous OWQ permit application forms:

- Storm Water Construction Rule 5 NOI
- Industrial Stormwater Rule 6 NOI
- Notice of Intent Rules 7-12
- Industrial Wastewater Construction Applications
- Municipal Wastewater Construction
- Sewer Construction Application
- New Well Site Application
- 401 Water Quality Cert
- Industrial Wastewater Construction Application
- Municipal Wastewater Construction Application
- Sewer Construction Application

By: July 1, 2003

**3) Data Integration**

Agency Enterprise Data System

- a) Develop a plan and assess our agency efforts to bring all agency databases into one multi-media system. This will include a complete assessment of IDEM's existing applications and databases (i.e. all major permit/compliance databases). The plan will consider cost, time requirements, and migration impacts on current users.

By: January 1, 2002

- b) Develop Place Components of Core Data Model

Review the agency's inventory of place information, document data maintenance, procedures/ rules, develop maintenance application components and migrate existing locational data into the core model.

By: January 31, 2001

- c) Populate the People/ Organization Components of the CORE Data Model

As a part of our agency system, pilot a project to maintain and associate interested parties with OAQ permit decision to ensure that interested parties are properly notified as a permit of interest to them goes through it's public process by March 30, 2002.

- (1) Develop a web-based application to allow citizens to register and create personal profiles to manage their information requests (print publications, notices, etc.) from IDEM.

By: May 30, 2002

- (2) Migrate Facility Linking Application (FLA) Data set to IDEM Core Data Model.

By: May 1, 2002

- (3) Develop process to maintain/populate EPA's systems with IDEM data utilizing our new data system.

By: December 1, 2002

#### **4) In-house Lecture Series for Staff**

- a) Establish a speaker series on multimedia topics and cross-office information.

By: September 1, 2001

- b) Survey staff for topics.

By: July 30, 2001

#### **5) Public Meeting Training**

- a) Continue to offer class quarterly.

Ongoing

- b) Create resource and "how to" guide for successful public meetings.

By: July 1, 2002

- c) Establish action plan for increasing community participation in public meetings.

By: July 1, 2002

#### **6) Updating/Organizing File-room**

- a) Develop and implement improvements for internal and external requests to better facilitate access to the agency's public records.

- b) Continue to improve file system.

- c) Working with OLC on Retention Schedule to achieve uniformity among programs and to address new types of documents.

By: June 1, 2002



## 4. BUILDING A BETTER IDEM

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### Introduction

Permitting, ensuring compliance, rule development, and remediation are at the heart of IDEM's mission. We are committed to enhancing these essential functions by continuing to issue on-time permits, streamlining permit processes, improving multi-media compliance/enforcement efforts, and by improving and prioritizing agency rulemaking processes.

IDEM is also auditing agency functions to ensure that our resources are most appropriately aligned with our most important projects. This audit allows IDEM to shift resources towards programs and services that further the Department's overriding goal of making Indiana a cleaner, healthier place to live.

We are enhancing our three regional offices to provide enhanced environmental services and an improved working relationship for both the public and the regulated community.

IDEM knows that smart, innovative, and efficient internal operations are the key to achieving environmental objectives. We are taking the following steps to simplify, streamline, and enhance internal processes to improve the environmental services we provide.

A first-class work environment, efficient internal processes, effective resource allocation, and a safe, well-trained workforce are just as essential to the functions of businesses and industry as they are to the Indiana Department of Environmental Management. We are investing in our workforce with enhanced training opportunities designed to improve efficiency for a more productive and safe work environment. Health and safety training programs work to protect employees who are exposed to potentially hazardous conditions in the field. Additionally, IDEM is examining and streamlining internal processes to improve efficiency and enhance employee satisfaction.

### A. Trains Run On Time

#### 1) Permitting

- a) Meet all mandated deadlines 100% of the time
- b) Establish internal targets for review periods for all permits/approvals/licenses without statutory/rule deadlines and meet these 100% of the time.

By: June 30, 2002

- c) Make final decisions on all pending operating permit renewals and remain current:

- (1) Office of Air Quality-OAQ – Title V
  - (a) OAQ plans to issue all but 40 (5%) of the 780 Title V Permits with application dates prior to December 31, 2000.

By: June 30, 2002

The 40 remaining permit applications have issues that involve significant changes in regulatory requirements in the near future, substantial public interest, or serious enforcement issues (e.g., major new source review) that necessitate longer timeframes. Specific schedules for resolving these issues and completing the issuance of these permits will be developed and monitored. Milestones for each quarter will be established and monitored.
  - (b) OAQ will issue 80% of these permits, and have 19% to public notice.

By: December 31, 2001
  - (c) OAQ will issue all but the most complex of these permits.

By: June 30, 2002
  - (d) OAQ will issue all the remaining Title V permits (for which applications were received by June 30, 1999).

By: June 30, 2003
- (2) Office of Land Quality - OLQ
  - (a) Reduce confined feeding approval backlog by 100%.

By: March 31, 2002
  - (b) Reduce solid waste permit renewal completed by 100%.

By: June 30, 2002
  - (c) Reduce RISC- contingent and non-RISC contingent, hazardous waste closure plan and enforcement-backlog.

By: June 30, 2003 — Reduce By: 30%
- (3) Office of Water Quality- OWQ
  - Meet permit schedule per Water Quality Focus agency priority.
- d) Improve and Foster Innovation in Permit Processes
  - (1) Develop and publish guidance materials, evaluate to assist the public with participating in IDEM decision making processes.

By: December 31, 2001
  - (2) Evaluate all permitting public notice processes with respect to enhancing public participation.

By: June 30, 2002

- (3) Revise permit processing protocols to be more consistent with the concept of Environmental Justice- including staff training and the delineation of EJ areas- and develop strategies for addressing permitting requests in EJ areas<sup>1</sup>.  
By: June 30, 2003
- e) Evaluate permit resources and make recommendations as needed to maintain effective permit programs
  - (1) Evaluate air, wastewater, drinking water and solid waste for further opportunities to establish general permits or permit by rule.  
By: December 31, 2001
  - (2) Establish schedule for identified opportunities and implement.  
By: June 30, 2003
  - (3) Review NPDES permits and update for consistency, clarity and simplicity.  
By: June 30, 2002
  - (4) RCRA Corrective Action and RCRA Closure/PostClosure  
Major initiative will be undertaken to streamline program to achieve interim program objectives quicker. Focus will be on obtaining control of contaminated ground water migration and preventing pathways to human health exposure. Progress will be measured on positive decisions for the above indicators. Changes will be implemented on an agreed upon schedule.  
By: December 31, 2001 — Identify possible changes to the program.

## 2) **Improve Agency Compliance/Enforcement Efforts**

- a) Continue Work of Compliance/ Enforcement Team  
Continue work of agency- wide Compliance/ Enforcement Team to meet/communicate regularly to evaluate information and formulate agency- wide compliance/enforcement strategies and resource allocation.  
Through: June 30, 2003
- b) Continue Compliance/ Enforcement Planning
  - (1) Continue multi-media compliance/enforcement planning and coordination in accordance with current operating procedures (COP) developed by the Compliance/Enforcement Team during 2000-2001. Utilize C/E Planning COP and periodically revise (as needed).  
Through: June 30, 2003
  - (2) Continue development and implementation of priority-specific Compliance Action Plans as a means to consistently track and periodically report on the progress of compliance issues and priorities.  
Through: June 30, 2003

<sup>1</sup> IDEM has recently developed an EJ strategic plan and drafted three publications that describe the many public participation processes related to environmental decision-making in IDEM. These publications were developed through a grant from EPA Region 5. The EJ strategic plan, which addresses the permitting process, and one of the draft publications may be viewed at our website: <http://www.in.gov/idem/environmentaljustice>.

- (3) Review, assess, adjust, and report to C/E Team by surveying and adjusting C/E priorities quarterly

Through: June 30, 2003

c) Improve Inspection and Enforcement Procedures

- (1) Continue regular meetings of Inspection Protocol Workgroup and smaller issue subgroups.

Through: June 30, 2002

- (2) Address listing of eleven potential inspection protocol issues identified by the C/E team during internal survey of C/E managers in 2000/2001 to make recommendations to C/E team for resolution of those issues.

By: June 30, 2002

- (3) Implement recommendations for issue resolution with written procedures.

By: December 31, 2002

- (4) Report on implementation of the enforcement referral process and recommend any necessary revisions and updates.

By: June 30, 2002

d) Continue Complaint Clearinghouse

- (1) Year-end Complaint Comparison

Summarize and compare and identify trends as they relate to complaints received and handled by IDEM for 1999, 2000, and 2001.

By: March 1, 2002 — Prepare for review.

- (2) PCC Quarterly Complaint Summaries

Generate quarterly complaint summaries and revise content as appropriate 3 weeks after all data is received each quarter.

Ongoing

- (3) Maintain Quattro-Pro based system in order to store, summarize and analyze cross program agency complaint information on a monthly and annual basis.

Ongoing

### 3) Rulemaking

- a) Office of Water Quality (OWQ) should establish workplan and schedule for critical rulemakings per Water Quality Focus priority.

By: June 30, 2002

- b) Office of Air Quality and Office of Land Quality should establish workplan and schedule for critical rulemakings.

By: September 1, 2001

- c) Office of Legal Counsel coordinates with Office of Air Quality, Office of Water Quality and Office of Land Quality the progress of meeting sunset requirements.

Quarterly: Meet sunset law deadlines and report.



- d) Continue Improvement of Agency Rulemaking Processes  
Evaluate creation of an Agency Rulemaking Coordinator position.

Functions could include:

- (1) management of the nature/ type/timing of documents that are forwarded to the Board, public, LSA, and other agencies related to rulemakings;
- (2) preparation of rulemaking documents on non-media specific rulemaking actions
- (3) coordination of the agency sunset rulemaking process and
- (4) other possible functions related to providing rulemaking information to the public and obtaining input on rulemakings.

By: October 1, 2001

- e) Continue to improve access to information on rulemaking including workgroups meeting schedules and points of contact for each rule on agency website. Develop internal communications protocol to assure that information is accurate and up-to-date.

By: February 1, 2002

#### **4) Remediation**

Although the IDEM's other "core" services are primarily preventive in nature, the Agency also has the responsibility to undertake the remediation of sites that have been contaminated by pollution. The IDEM's work cleaning up sites under a variety of statutory and regulatory authorities is an ongoing and major commitment of resources. Examples of possible commitments include:

- a) Fully implement the RISC policies and establish an ongoing process for science-based revisions to RISC policies.

By: March 30, 2002

- b) Develop a GIS-based model for geographic assessment of potential health risk as a decision-making / site prioritization tool in order to most efficiently and effectively direct our resources.

By: June 30, 2002

- c) Using the above GIS-based model, target high human risk areas (not specific sites) in areas of high population density and low economic advantage.

By: July 30, 2002

- d) Evaluate available resources and funding for completing state-driven cleanups and make recommendations as needed.

By: June 30, 2002

#### **5) Purchasing**

- a) Create a "how to" manual for requisitions.

By: November 1, 2001

- b) Develop appropriate requisition training for staff.

By: January 31, 2002

- c) Establish and implement turnaround timeframes for requisition processing.

By: March 1, 2002

- d) Fully utilize Asset Management System within PeopleSoft.

By: June 30, 2002

**6) Paying the Bills**

Establish and meet expectations for all payments.

- a) Establish turnaround timeframes for payment of claims, SDO claims, Travel Reimbursements, and Purchase Order Payments.

By: September 30, 2001

- b) Develop appropriate training on the following administrative topics:

- Travel training

By: September 30, 2001

- Petty Cash training

By: October 31, 2001

- SDO Claims

By: October 31, 2001

- Claims Process training

By: December 12, 2001

- Chartfielding

By: December 31, 2001

- Purchase Order Processing

By: March 31, 2002

**7) Cost Recovery**

Continue the agency focus on recovering costs from potentially responsible parties.

- a) Develop a plan for cost recovery efforts (Legal, Land and Accounting).

By: July 30, 2001

- b) Implement plan.

By: January 30, 2002

- c) Set a financial goal for FY 2002.

By: August 30, 2001

- d) Set a financial goal for FY 2003.

By: August 30, 2002

- e) Meet financial goal for FY 2002.

By: June 30, 2002

- f) Meet financial goal for FY 2003.

By: June 30, 2003

**8) Billing & Accounts Receivable**

Establish consolidated agency-wide billing and accounts receivable function.

- a) Load and maintain all accounts receivable on PeopleSoft.

By: July 1, 2001

- b) Create policy team to determine agency billing and collection policies.

By: September 1, 2001

- c) Standardize agency policies regarding all billings and collections activities.

By: December 31, 2001

- d) Centralize and streamline processing of all agency invoices using PeopleSoft.

By: July 1, 2002

**B. Innovative and Smart**

- (1) Identify two innovation concepts under the ECOS/EPA Innovations Agreement.

By: August 1, 2001

- (2) Submit one innovation concept to EPA (likely to be CSO Watershed Management approach).

By: September 1, 2001

- (3) Submit second innovation concept to EPA.

By: October 1, 2001

- (4) Seek EPA approval and implement if approved.

- (5) Metal Casting Sector

In coordination with EPA, IDEM is working with the Metal Casting industrial sector on improving compliance, promoting foundry sand reuse, developing a New Source Review guidance document and implementing an environmental management system (EMS) at 12 Indiana metal casting facilities.

- (a) Foundry Sand Reuse

In coordination with EPA, initiate and facilitate meetings with INCMA and Department of Commerce on developing and marketing foundry sand reuse opportunities and finalizing the National reuse guidance to states and industry.

By: January 1, 2002

- (b) Environmental Management Systems

Assist contractor in implementing environmental management systems at 12 small metal casting facilities.

By: July 1, 2003

- (c) New Source Review Guidance Manual

Facilitate the finalizing of the National NSR guidance for metal casting facility operators and regulators. This document will be drafted by EPA, then tailored by IDEM to fit Indiana's needs. A final guidance manual should be completed.

By: June 30, 2002

## C. Workforce Improvements

### 1) *Investing in Staff*

IDEM's staff members are our most valuable resource. We will strive to improve our work environment in the following areas:

#### a) Training

- (1) Continue to enhance IDEM's training curriculum. Add at least 2 new training opportunities to our training curriculum.

By: October 31, 2001

- (2) Research and present options to IDEM's senior leadership team for a Leadership Development Program.

By: December 31, 2001

- (3) Implement the Leadership program.

By: March 31, 2002

#### b) Sick Leave Options

- (1) IDEM will research and develop a proposed policy for donating sick time to coworkers in need.

By: March 31, 2002

- (2) IDEM will actively seek to obtain approval from the State Personnel Department to run a pilot program.

By: June 30, 2002

#### c) Fill Vacancies Quickly

- (1) Provide "how to" guidance on quickly filling vacancies to all supervisors.

By: July 31, 2001

- (2) Create staffing goals for each IDEM supervisor.

By: July 31, 2001

- (3) Establish quarterly report on vacancies.

By: October 31, 2001

#### d) Centralized Health/ Safety Training Program

- (1) Establish and fully implement a consistent centralized Health and Safety Training program within IDEM to provide training in accordance with OSHA standards found in 29 CFR 1910.120.

By: June 30, 2002

- (2) Get essential staff trained.

By: August 30, 2001

- (3) Establish a centralized staff group.

By: September 30, 2001

- (4) Establish agency network of Health and Safety contacts.

By: September 30, 2001

- (5) Establish centralized medical monitoring.

By: March 30, 2002

- (6) Implement medical monitoring for appropriate staff.

By: June 30, 2002

## **2) Dis-investments**

- a) Each office will create an inventory of specific functions. Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or under funded activities.

By: October 1, 2001 — Create inventory.

By: November 1, 2001 — Evaluate functions.

- b) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.

By: December 31, 2001

- c) The above review will be repeated on the same schedule

During: Calendar year 2002

## **3) Regional Offices**

- a) Make recommendations and gain approval from Commissioner on added services for the Regional Offices.

By: September 30, 2001

- b) Implement added services.

By: December 31, 2001

- c) Evaluate added services.

By: June 30, 2002

- d) Conduct review of, and make recommendations for improved Regional Offices and Air, Water and Land offices "operating procedures."

By: March 31, 2002



**IDEM Office Priorities**

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## 5. OFFICE OF AGRICULTURAL RELATIONS

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### 1) ***Confined Feeding (CFO) Rule***

Information available to External working group prior to public meetings

Final Draft – Final Adoption March 14, 2001

### 2) ***Agricultural Community and CFO Producer Education***

(Ongoing activities)

- a) Convey meat of CFO (and other Ag related) rules without losing producers
- b) Highlight new information included in CFO Rule
- c) Highlight known “hot” issues
- d) Create positive atmosphere for discussion
- e) Encourage questions from producers

### 3) ***CFO Guidance Manual***

- a) Producer interpretations of CFO Rule
- b) Practical Examples
- c) Ready to use Operating Record Forms
- d) New CFO Approval Application

### 4) ***Manure Management Plans – CFO Approval Renewals***

- a) Participate in meetings held by CES, SWCD, NRCS around state
- b) Increase awareness of those operations whom are effected
- c) Encourage questions for clarification
- d) Increase knowledge of CFO approval and renewal process

### 5) ***CFO Grant Dollars***

- a) Re-visit and Re-allocated where necessary. Dollar allocations by SWCDs.

By: June 30, 2001

- b) Help to find additional financial assistance for those producers effected by CFO Rule changes
- c) Find new sources of funding for producers wanting to install environmental and land conservation practices
- d) Work closely with USDA/NRCS to identify and help livestock and poultry producers

### 6) ***Sec. 319 Grants***

(Ongoing activities)

- a) Increase awareness of grant dollars available to individuals and producer groups
- b) Create awareness of grants currently being funded
- c) Update list of grants available for agricultural community – continuing

**7) Agriculture Information Web Site**

(Updates continuing – New views with new web site)

- a) Updated information on IDEM issues effecting agriculture
- b) Create web link from IDEM Ag field to Grant list.

By: August 1, 2001

- c) Connect with other links of interest to the Agricultural Community

**8) Continued Education for Compliance Field Staff**

(Priority to be handled by OLQ specifically at their request)

- a) Increase knowledge of Confined feeding operations
- b) Increase understanding of issues related to confined feeding operations
- c) Training program
- d) Complete one phase of continuing training.

**9) Recognition program for Ag. Leaders**

(Efforts & Ideas Continuing)

- a) Similar to 5 star or 100% Compliance
- b) Ideas presented internally

**10) Continued follow-up with Ind. Pork Producer Audit Program**

- a) Re-focus and promotion push

By: May 30, 2001

- b) Monthly follow-up with IPPA on progress

By: September 1, 2001— 50 producers audited

**11) Explore ideas for voluntary audit program for other animal species or production practices.**

(Continuing Effort)

## 6. OFFICE OF AIR QUALITY

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The Office of Air Quality (OAQ) works to safeguard the quality of Indiana's air through implementing the requirements of the Clean Air Act, developing and enforcing state rules governing air quality standards, evaluating and issuing permits for construction and operation, conducting compliance activities and monitoring Indiana's air quality.

Our vision is of clean and breathable air throughout our state, which meets all health-based standards. OAQ strives to achieve our vision to continuously reduce toxic releases, maintain air quality improvements and achieve all health based or air quality standards in our state.

We will continue to pursue our vision by effectively using all resources, including coordinating those within OAQ and other offices in a manner that is both innovative and directly reflective of the agency's environmental priorities and by regularly forming working partnerships with EPA, the regulated community and the general public to achieve environmental results.

### A. OAQ — Agency-Wide Priorities

#### 1) *Building a Better IDEM*

- a) Create a "dis-investment" inventory of specific functions by October 1, 2001. Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or underfunded activities.

By: November 30, 2001

- b) Meet all mandated permit deadlines 100% of the time.
- c) Establish internal targets for review periods for all permits/approvals/licenses without statutory/rule deadlines and meet these 100% of the time.

By: June 30, 2002

- d) Title V permits

- (1) OAQ intends to issue all but some of the most complex of the Title V permits.

By: June 30, 2002

- (2) Issue all the remaining Title V permits (for which applications were received by June 30, 1999).

By: June 30, 2003

Milestones for each quarter will be established and monitored.

- e) Evaluate all permitting public notice processes with respect to enhancing public participation.

By: June 30, 2002

- f) Revise permit processing protocols to be consistent with the concept of Environmental Justice—including staff training (not limited to permits staff) and the delineation of EJ areas—and develop strategies for addressing permitting requests in EJ areas.

By: June 30, 2002

- g) Evaluate further opportunities to establish general permits or permits by rule by December 2001, establish schedule for identified opportunities and implement.

By: June 30, 2002

- h) Continue to participate in work of Compliance/Enforcement team.

Ongoing

- i) Establish workplan and schedule for critical rulemakings.

By: September 30, 2001

- j) Facilitate finalizing the National NSR guidance for metal casting facility operators and regulators. This document will be drafted by EPA, then tailored by IDEM to fit Indiana's needs.

By: June 30, 2002 — A final guidance manual should be completed.

## **2) Reduce Toxics**

- a) Identify pollutants that pose risks to public health and the environment through a cross-media review, and identify agency initiatives to address them.

- (1) Conduct integrated analysis of results of ToxWatch study, National Air Toxics Assessment, Cumulative Risk Initiative, Toxics Release Inventory, Office of Water Quality metals sampling and other screening tools to identify pollutants, industries, or geographic areas of concern.

By: June 30, 2002

- (2) Develop and implement agency initiatives to address sources of such pollutants, using pollution prevention, technical assistance, rule changes, compliance and other available tools.

By: June 30, 2003

- b) Participate in development of statewide mercury inventory.

By: December 31, 2002

- c) Conduct ambient air monitoring for air toxics.

Ongoing

- d) Fiberglass and reinforced plastics manufacturing compliance and enforcement efforts.

June 30, 2002

- e) Develop and implement radon awareness program.

By: December 31, 2002

- f) With public input, determine projects for spending BP Amoco Consent Decree dollars. Develop implementation schedules and implement according to schedule.

By: January 31, 2002

- g) Continue work of Northwest Indiana Diesel initiative.

Ongoing

**B. OAQ — Office-Wide Priorities****1) Prepare for implementation of the NOX SIP Call**

- a) Complete submissions of fully adopted NOX rule, budget demonstration and initial allocations to USEPA.

By: August 31, 2001

- b) Approve all monitoring plans, protocols, and CEMS certification tests within 60 days of those plans submitted prior to 6/30/02. Quality assure NOx CEMS at sources that will be subject to the NOX Rule. Coordinate the CEMS certification program with U.S. EPA.

By: May 1, 2003

- c) Review CEMS certifications for early reductions.

(1) Review all CEMS certifications within 60 days of receipt.

(2) All certifications will be reviewed.

By: April 30, 2002

- d) Develop forms for permit applications, allowance allocation requests for new sources and EE/RE, compliance supplement pool request, opt-ins, 25 ton exemption.

Deadlines:

- December 31, 2002 — Permit application forms
- December 31, 2002 — New unit forms
- December 31, 2003 — EE/RE forms (in addition to EPA forms)
- December 31, 2001 — CSP
- December 31, 2002 — Opt-ins
- December 31, 2001 — 25 Ton exemption
- December 31, 2003 — Compliance certification

- e) Develop training (internal and external) as necessary in addition to guidance developed by EPA for small businesses subject to Section 126 requirements.

By: December 31, 2002 — develop training

By: December 31, 2003 — administer training

**2) BP Amoco Consent Decree**

- a) Oversight of implementation of consent decree requirements.

(1) Develop a system to track and review all submittals and compliance elements required by the Consent Decree.

By: July 31, 2001

(2) Provide a quarterly update of the status of the submittals and compliance elements and a status of IDEM review of those submittals.

By: September 30, 2001

- b) With public input, determine projects for spending Amoco Consent Decree penalty money. Develop implementation schedules and implement according to schedule.

By: January 31, 2002

**3) Compliance Monitoring**

## a) Rule making

By: December 31, 2001 — Second Notice  
 By: April 30, 2002 — Preliminary adoption  
 By: October 31, 2002 — Final adoption

## b) Finalize Guidance

Deadline: Within 90 days of effective date of the Compliance Monitoring rule.

## c) Outreach/training

## (1) Conduct internal guidance and training of inspectors and permit writers.

Deadline: Within 90 days of the effective date of the rule.

## (2) Conduct external guidance and training of Title V permittees.

Deadline: Within 90 day of the effective date of the rule.

**4) OAQ web redesign and maintenance**

Working with Office of Public Policy and Planning, complete OAQ web redesign and maintain web pages.

## a) Organize web pages into new format, including the addition of all new "web-links pages."

By: October 31, 2001

## b) Complete work on new web pages identified in each branch's two-year plan.

By: December 31, 2002

**5) Integrate Pollution Prevention into OAQ activities**

## a) Work with OPPTA and contractor to develop Pollution Prevention in Permitting and Rulemaking Guidebook and/or computer based tools.

By: June 30, 2002  
 By: November 1, 2001 — BAA finalized

## b) Integrate P2 elements into compliance activities.

## (1) Implement inspector training, changes to inspection protocol and report to further incorporate P2.

## (a) Develop an inspector fact sheet/guide OPPTA with the assistance of OAQ will develop handouts to be used by inspectors during inspections.

By: September 30, 2001

## (b) Amend the inspection report to include a P2 element.

By: September 30, 2001

## (c) Compliance managers with the assistance of OPPTA will provide training to inspectors on the benefits of P2 and the role of the inspector.

By: December 31, 2001

## (d) Compliance managers with the assistance of OPPTA will identify sectors that may be appropriate for P2 compliance work.

By: December 31, 2001

- (e) Section Chiefs will include P2 and P2 training as part of the regular staff/inspector meetings.

By: December 31, 2001

- (f) OAQ and Regional Offices will include P2 in the job description of the inspectors.

By: June 30, 2002

- (2) Implement a sector based Technical Assistance Program focusing on small business foundries, metal furniture products, miscellaneous metal parts and plastic parts.

- (a) Develop a scope of work and contract with the Clean Manufacturing Technology Institute (CMTI) to provide technical assistance via on-site, in-plant process engineering consultations, workshops, seminars, conferences, information brochures, website information services and electronic communications.

By: June 30, 2001

- (b) Administer contract with CMTI for compliance assistance to selected sources. The quantity and quality of contacts within each sector, on-site and in-plant consultations, workshops, seminar, and conferences, informational brochures, website information services, electronic communications, those sources "opting out" of a NESHAP, the number of sources submitting permit applications, and submission of emissions statements will be assessed and evaluated quarterly.

Quarterly: Through December 31, 2003

- (c) Complete a written assessment of the contract and make recommendations for future Technical Assistance Programs.

By: December 31, 2003



## C. OAQ — Office Support

### 1) *Work with Agency Health and Safety Officer to implement agency Health and Safety policy*

Ongoing: As required  
 By: Agency policy.  
 By: August 31, 2001 — develop specialized curriculum for Air Monitoring Branch staff and air inspectors (schedule according to agency policy).

### 2) *Work with HR throughout the year to increase OAQ workforce diversity.*

By: August 31, 2001 — After consultation with HR, develop written plan to address OAQ's workplace diversity. Implement plan according to schedule.

### 3) *Meet or exceed goal of submitting hire request within 12 weeks from the date of vacancy for at least 90% of hiring decisions.*

By: June 30, 2002

### 4) *Local agency contracts signed and in effect.*

By: December 15, 2001

- a) Work toward goal of renewing contracts and or preparing two-year contracts. Approve local agency work plans.

By: July 31, 2001

- b) Submit final contracts to locals for signature.

By: July 31, 2001

- c) Submit contracts to IDEM Commissioner for signature.

By: August 31, 2001

### 5) *Visit each local agency twice between July 1, 2001 and June 30, 2002. (Winter Bottom)*

By: July 31, 2001 — Prepare schedule for visits.

### 6) *Work with OMBA to develop a method to perform a basic financial audit.*

By: June 30, 2002

### 7) *Continue to work with OMBA to establish realistic program and branch budgets.*

Ongoing

### 8) *Train all staff on OMBA policies.*

By: October 30, 2001

### 9) *Continue to maximize training opportunities.*

- a) Continue to outreach to other IDEM offices, other government agencies, trade associations and private citizens.

Ongoing

- b) Look for other sources of training that are available through a satellite downlink, internet, or other mechanisms.

Ongoing

## D. OAQ — Branch Specific Priorities

### 1) **Permits Branch**

The OAQ Permits Branch issues permits to sources that emit pollutants to Indiana's air. This includes: Construction and Operating Permits, Permit Completion Guidance, Title V Operating Permits, FESOP / SSOA Permits.

- a) Issue all New Source review decisions on time.

Ongoing

- b) Establish internal targets for review permits/approvals/licenses without statutory/rule deadlines and meet these 100% of the time.

By: June 30, 2002

- c) Issue all but 40 (5%) of the Title V permits with application dates prior to December 31, 2000 before June 30, 2002.

- (1) 80% of the permits issued and 19% to public notice

By: December 31, 2001

- (2) All but the most complex of remaining permits issued

By: June 30, 2002

- (3) All remaining permits with applications received by June 30, 1999 issued

By: June 30, 2003

- d) Issue all FESOP renewals.

By: December 31, 2001

- e) Implement a permitting pilot in the Northern Regional Office.

- (1) Initial proposal for pilot with list of issues and initial meeting with NRO.

By: July 31, 2001

- (2) Implement permitting pilot

By: June 30, 2002

- f) Make all necessary revisions to Title V rules and program to receive full federal approval and to comply with HB 1343.

By: December 31, 2001

- g) Submit request for final federal approval of Prevention of Significant Deterioration program.

By: December 31, 2001

- h) Public participation goals/activities

- (1) Develop enhanced public outreach approach for permits (both Title V and construction) as needed.

Ongoing

- (2) In coordination with EPA, develop and offer a training for citizens on the new source review permitting process.

- (a) Develop training materials

- By: October 31, 2001

- (b) Offer training

- By: March 31, 2002

- i) Evaluate all permitting public notice processes with respect to enhancing public participation.

- By: June 30, 2002

- j) Revise permit processing protocols to be more consistent with the concept of Environmental Justice—including staff training (not limited to permitting staff) and the delineation of EJ areas—and develop strategies for addressing permitting requests in EJ areas.

- By: June 30, 2002

- k) Evaluate further opportunities to establish general permits or permits by rule.

- By: December 31, 2001

- l) Establish schedule for opportunities identified to establish general permits or permits by rule and implement.

- By: June 30, 2002

## 2) **Compliance Branch**

The OAQ Compliance Branch works to ensure that sources in Indiana comply with all applicable state and federal air pollution regulations by conducting inspections and reviews of compliance data and information. Activities in the branch include: inspection and other compliance monitoring activities of major stationary sources, reviews of open burning, and compliance data reviews.

- a) Implement a strategic inspection plan that will include inspecting all sources responsible for 95% of the emissions statewide excluding gas compressor stations.

- By: June 30, 2002

- b) Respond to 100% of all complaints received by the branch and regional offices.

- By: June 30, 2002

- c) Implement the Draft EPA Compliance Monitoring Strategy (CMS) for inspections and compliance evaluations.

- (1) Develop a Compliance Monitoring Strategy plan with U.S. EPA Region V.

- By: September 30, 2001

- (2) Conduct full compliance evaluations of all Part 70 sources once every 2 years except as noted in the CMS. Inspect all Part 70 sources that were not inspected in the previous year except for those sources exempted in the CMS.

- By: June 30, 2002

- (3) Conduct full compliance evaluations of all FESOP sources once every 5 years except as noted in the CMS. Inspect all FESOP sources that have not been inspected in the last 4 years.  
By: June 30, 2002
- d) Emissions statements and TRI reporting and compliance discrepancies
  - (1) Identify sources where emissions statements or TRI reports show sources are above their permitted VOC or HAPs limits.  
By: December 31, 2001
  - (2) Implement a strategic inspection program where emission statements or TRI reports indicate sources are above their permitted VOC or HAPs limits.  
By: June 30, 2002
- e) Develop and implement compliance database system that links current separate databases as well as other OAQ and agency databases. The database system will follow all agency data integration criteria.
  - (1) Draft and submit a Scope of Work request to IT  
By: August 31, 2001
  - (2) IT to begin Scope of Work evaluation & train new OAQ staff on existing databases and AIRS/EPA reporting  
By: September 30, 2001
  - (3) Complete Scope of Work  
By: December 31, 2001
  - (4) Draft contract, select vendor and begin implementation of the contract  
By: February 28, 2002
  - (5) Complete project  
By: June 30, 2003
- f) The Indiana Department of Environmental Management will evaluate the hardware, software and resources needed to maintain the state AIRS facility subsystem and will develop an action plan. Until such time that Indiana staff have been trained and the program is up and running, Region 5 will continue to process Indiana's compliance and enforcement data.  
By: December 31, 2001 - Develop action plan.
- g) Develop coordinated compliance program with OLQ focusing on sources subject to NESHAPs that contain leak detection requirements.
  - (1) Meet with OLQ to determine scope of priority (e.g. sectors or types of sources to be included in program).  
By: August 31, 2001
  - (2) Develop specific goals and tasks for the compliance program and identify responsibilities of each office.  
By: September 30, 2001

- (3) Implement compliance program  
By: December 31, 2001
- (4) Complete program and make recommendations for future coordination and compliance efforts.  
By: June 30, 2002

h) AHERA

- (1) Conduct 20 AHERA inspections at school systems focusing on schools that currently have asbestos removal projects.  
By: June 30, 2002
- (2) Develop and implement an education and communication plan with the Department of Education to inform school systems about AHERA requirements.  
By: December 31, 2001

i) Annual compliance certification project

- (1) Re-evaluate current OAQ and EPA policies and procedures for annual compliance certifications.  
By: September 30, 2001
- (2) Make recommendations for changes, updates, revisions, and development of new policies and procedures and guidance.  
By: September 30, 2001
- (3) Complete revision of nonrule policy; Complete development of any forms or guidance.  
By: November 30, 2001
- (4) Train OAQ staff on current policy and review procedures.  
By: January 30, 2002
- (5) Provide training to sources on current policies.  
By: January 30, 2002
- (6) Review 95% of all Title V and FESOP annual compliance certifications submitted to the agency within 90 days of receipt of the certification.  
By: June 30, 2002
- (7) Identify late and non-submitters of Title V and FESOP annual compliance certifications. Implement the compliance/enforcement guidance issuing violation letters and referring appropriate cases to Office of Enforcement for late or failure to submit a Title V and FESOP annual compliance certification.  
By: June 30, 2002

- (8) The branch will provide a written summary of the annual compliance certification program for FY 02. At a minimum, this summary will include the number of certifications required, number submitted, number of late submissions, number of violation letters and referrals, and the number of sources identifying non compliance.

By: June 30, 2002

j) Styrene compliance evaluation 326 IAC 20-25

- (1) Identify and inspect at least 15 sources in the NRO area subject to 326 IAC 20-25, concentrating on those sources that have not notified IDEM that they are subject to the rule, those that fail to notify IDEM of compliance, and those that pose the greatest potential for harm.

By: January 30, 2002 — Identify sources.

By: June 30, 2002 — Inspect 15 styrene sources that failed to notify.

- (2) Coordinate an enforcement strategy for non-compliance with the styrene rule that would include development of Compliance/Enforcement Referral Guidance and potential Enforcement strategies.

By: January 30, 2002

- k) Approve protocols, quality assure and validate 85% of compliance tests focusing on Title V, FESOPS, nonattainment counties, NESHAPS, enforcement orders, and emission factors. Resolve protocol, testing, applicable permitting issues, and rule issues.

By: June 30, 2002

- l) Certify continuous emission monitoring systems (CEMS) and quality assure 85% of CEMS tests of NSPS, SIP, NOx, and Part 75 sources focusing on monitoring systems performance, enforcement, and contractor performance. Resolve quality assurance and performance specification testing issues.

By: June 30, 2002

**3) Ambient Air Monitoring Branch**

The Ambient Air Monitoring Branch maintains and analyzes the information from Indiana's ambient air monitoring stations located across the state. This includes: monitoring for all criteria pollutants, conducting ambient monitoring for certain air toxics, quality assuring data, and communication of monitoring information to the public through Ozone Web, ToxWatch and other means.

- a) Continue to operate and review all ambient networks to track National Ambient Air Quality Standards compliance for all criteria pollutants.

- (1) Track monthly valid data return.

Monthly

- (2) Achieve 90% valid data return for intermittent parameters.

Monthly

- (3) Provide final, quality assured ozone data after close of ozone season.

By: November 15, 2001

- (4) Conduct annual network review in conjunction with Lake Michigan Air Directors Consortium Regional Planning Organization.  
By: December 31, 2001
- b) Continue Indiana Air Toxic Monitoring Program
  - (1) Continue operation of 8 permanent canister sites and one special study site (School 21 in Indianapolis).  
Ongoing
  - (2) Track monthly valid data return for toxics site and meet 90%.  
Monthly
  - (3) After consultation with Air Toxics Advisory Group, finalize TO-15 analyte list, acquire standard, and begin analyzing the canister samples for those analytes.  
By: July 31, 2001
  - (4) Implement enhancements at Indianapolis Washington park site to become a supersite, in accordance with National Air Toxics Monitoring Program grant.  
By: December 31, 2001
  - (5) Maintain up to date information on Toxwatch website.  
Ongoing: With monthly data updates
- c) Establish PM-2.5 Speciation Monitoring Network
  - (1) Research alternative continuous methodologies.  
By: August 31, 2001<sup>2</sup>
  - (2) Submit revised network plan to EPA.  
By: August 31, 2001<sup>2</sup>
  - (3) Procure and prepare instrumentation for field.  
By: December 31, 2001<sup>2</sup>
  - (4) Procure monitoring location and establish 4-6 sites, depending on monitoring methodology chosen.  
By: December 31, 2001<sup>2</sup>
  - (5) Track Valid Data Return and achieve at least 90%  
Monthly
- d) Conduct data analysis on PM2.5 data
  - (1) Develop objectives for data analysis project, in conjunction with LADCO data analysis objectives  
By: June 30, 2001

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<sup>2</sup> Date is contingent upon development and availability of continuous instrumentation.



- (2) Perform mass data analysis and event-specific meteorological re-constructions  
By: December 31, 2001
- (3) Produce final mass data analysis report on 99/00 data  
By: February 28, 2002
- (4) Develop objectives for speciation analysis  
By: March 31, 2002
- (5) Perform speciation analysis  
By: June 30, 2002
- (6) Produce final speciation data analysis report  
By: August 31, 2002
- e) Conduct Visibility Monitoring
  - (1) Submit monitoring plan to EPA  
By: December 31, 2001
  - (2) Procure and prepare instrumentation for field  
By: February 28, 2002
  - (3) Procure monitoring location and establish site  
By: February 28, 2002
- f) Conduct Special Purpose Monitoring for complaint or source problem
  - (1) Operate continuous PM-10 SPM in Columbus  
Complete by: August 31, 2001
  - (2) Initiate continuous PM-10 SPM in Auburn  
By: September 30, 2001

#### **4) Programs Branch**

The Programs Branch of OAQ develops air regulations and programs designed to meet the requirements of the Clean Air Act and improve air quality in Indiana. This includes: strategic planning for OAQ, emission statement reporting, inventory development, vehicle I/M program support, air toxics program, rules development, and a variety of outreach activities.

- a) Inspection/Maintenance
  - (1) Gain approval of I/M SIP revision from USEPA  
By: June 30, 2002
  - (2) Commence OBD II testing  
By: January 1, 2002
- b) Criteria Pollutants
  - (1) Obtain USEPA approval of Lake and Porter Attainment Demonstration Counties  
By: October 31, 2001

- (2) Lake County SO<sub>2</sub> Redesignation Modeling & Rulemaking Activities
  - (a) Publish Second Notice  
By: February 28, 2001
  - (b) Final Adoption of Rule  
By: September 30, 2002
- (3) Complete Clark/Floyd Redesignation (provide information to USEPA as needed)  
By: October 31, 2001
- (4) Complete 1999 periodic inventory
  - (a) Develop comments on US EPA draft National Emissions Inventory (NEI), Version 2 (due October 2001)  
By: February 28, 2002<sup>3</sup>
  - (b) Final inventory to US EPA  
By: June 30, 2002
- (5) Work with USEPA to gain approval of outstanding SIP submittals
  - Rolls Royce
  - Illinois Cereal Mills
  - Johns Manville
  - Safety Kleen
  - Cold Cleaning Degreasers
  - I/M
  - Cerestar
  - Refueling/Transport
  - SO<sub>2</sub> Monitoring
  - Crane Naval Warfare
  - Start up/shut down rule
  - Union Tank Car  
Ongoing: Through June 30, 2002
- (6) PM 10 Redesignation
  - (a) Review inventory and current SIP  
By: August 31, 2001
  - (b) Assess SIP modifications and need for additional modeling  
By: October 31, 2001
  - (c) Perform necessary modeling  
By: May 31, 2002
  - (d) Draft Redesignation Request

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<sup>3</sup> Subject to EPA's release of NEI, version 2

By: June 30, 2002

c) Develop and implement a radon awareness program in Indiana<sup>4</sup>.

(1) Develop a plan to improve data management.

By: November 30, 2001

(2) Implement plans for improved data management.

By: June 30, 2002

(3) Obtain input from external stakeholders on program development.

By: June 30, 2002 — Hold at least one of three meetings.

By: October 30, 2002 — Hold the other two meetings.

(4) Develop a radon Website that links to ISDH.

By: April 30, 2002

(5) Develop a two-year plan for the radon awareness program.

By: December 31, 2002

d) Air Toxics projects

(1) Complete ToxWatch data analysis and issue final report

(a) Review findings with ATAG; identify recommendations for next steps

(b) Develop and implement communication strategy (w/assistance from OAQ Outreach)

By: December 31, 2001

(2) In coordination with USGS, perform mercury monitoring data assessment

(a) Develop objectives for mercury data analysis

By: November 30, 2001

(b) Perform assessment of event – specific monitoring data for first full year of data

By: June 30, 2002

(3) Hazardous air pollutant inventory development

(a) Complete and document 1999 point source 188 HAP inventory to support National Emissions Information (NEI) submittal

By: December 31, 2001

(b) Complete and document comprehensive point, area, and mobile 1999 HAP inventory for the Great Lakes Commission and NEI.

By: June 30, 2002

(4) Metals Initiative

Research and evaluate emissions from electric arc furnaces and metal materials scrap yards, including an assessment of fugitive dust and fugitive gaseous mercury

<sup>4</sup> Due to a delay and uncertainty in the development of federal safe drinking water standards, plans for this program may change.

emissions. Consult with USEPA, other states, and other sources for relevant information.

Complete survey of available information including recommendations for next steps

By: June 30, 2002

(5) Neighborhood Assessment Pilot

- (a) Review ongoing or planned remediation sites for those where contamination from off-site air deposition is likely. Evaluate sites for possible pilot project to assess off-site impacts, including estimates of costs and feasibility.

By: June 30, 2002

- (b) Identify next steps and plan for implementation

By: June 30, 2002

(6) Agency Reduce Toxics Priority

Work within agency structure to provide technical support in the effort to perform an integrated analysis, using available tools, of available environmental and health data to identify pollutants of concern. Also, support the development and implementation of agency initiatives to address sources of such pollutants.

By: June 30, 2002 — Analysis

e) Rules projects

(1) Emissions Reporting rule

Third comment period: August, 2001  
Final Adoption: March, 2002

(2) Steel Pickling rule

Second Notice: November, 2001  
Final adoption: June, 2002

(3) Dip Tank rule

First Notice: August, 2001  
Final Adoption: May, 2002

(4) Non-CTG RACT Rule

First Notice: December, 2001  
Preliminary Adoption: June, 2002

(5) Article 2 Fix-ups

First notice: March, 2002  
Second Notice: July, 2001  
Preliminary Adoption: December, 2002

- (6) Implement a systematic approach to include pollution prevention opportunities using OPPTA expertise in the rule development process, including:

- Bi-annual planning meetings
- Shared work plans
- Initial meetings prior to first notice publication

- Development of rule specific P2 plan.

Ongoing

(7) Establish workplan and schedule for critical rulemakings

By: September 30, 2001

f) Outreach projects

(1) Air Quality Report 2000-2001

By: October 31, 2001 — First draft

By: November 30, 2001 — Report to MACS

By: January 30, 2002 — Final report on Web

(2) I/M Report

By: October 31, 2001 — Draft

By: January 31, 2002 — Final report

(3) Develop Transportation and Air Quality educational materials for Drivers' Ed courses

(a) Make recommendations for materials and distribution points

By: August 31, 2001

(b) Develop materials and distribute

By: March 2002 (in time for summer 2002 courses)

(4) Complete Project LEAP indicator projects

Provide interactive capabilities for gathering and sharing indicator project data.

By: January 31, 2002<sup>5</sup>

g) Minor New Source Review Modeling Project

(1) Finalize permit modeling guidance

By: July 31, 2001

(2) Screen all minor NSR permits for criteria pollutant and HAP

By: October 31, 2001

(3) Draft report and recommendations for next steps for criteria pollutants

By: November 30, 2001

(4) Draft report and recommendations for next steps for HAPs

By: February 28, 2002

h) Northwest Indiana Diesel Initiative

(1) Produce report of activities to date, including results of survey, and recommend next steps.

By: August 31, 2001

<sup>5</sup> Schedule dependent upon Access Indiana resources.

- (2) Participate in coordinated effort between the Northwest Diesel Workgroup and U.S. EPA's diesel initiative, and report on status quarterly.

Ongoing

## 7. OFFICE OF BUSINESS AND LEGISLATIVE RELATIONS

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 Office Of Business And Legislative Relations  
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The Office of Business and Legislative Relations (OBLR) is instrumental in serving as a liaison to the Indiana General Assembly and assisting the 150 state legislators and their constituents. In addition, OBLR serves members of Indiana's business community both large and small.

During Fiscal Year 2000, the Office of Legislative Relations responded to over 695 legislative constituent requests. A wide range of constituent cases included anything from checking on the status of a wastewater permit, State Revolving Loan application or a Title V Permit to helping set up meetings for small communities to discuss enforcement actions.

The Office of Business Relations, which falls under IC 13-28-3-4, assists the business community with specific matters pending before the agency such as status of a permit application or enforcement as well as any business related customer service issues. The office listens to the concerns of the business community, investigates and facilitates the resolution of issues.

During Fiscal Year 2000, the Office of Business Relations responded to over 40 business constituent requests.

### **Improve Work Environment:**

#### **1) Educational Opportunities**

Gain more practical experience by visiting 10 different environmental sites with inspectors.

By: June 30, 2002

#### **2) Communication**

a) More community involvement with legislators' districts.

- (1) Educational Trips  
 Put together 5 trips.

By: December 31, 2002

- (2) Visit with 50% of the Environmental Committee Members.

By: December 31, 2001

b) Work better w/MACS and divisions on promoting special events and problems. Each legislator must be notified of a potential problem or announcement within 72 hours of the event.

c) Put together a database of past legislation that was submitted by staff in previous years.

By: December 31, 2001

d) Legislative Proposal to Governor's Office.

By: July 31, 2001

- e) Twenty-four hour turn around for legislative constituent cases.
- f) Notify legislators and the House and Senate Environmental Affairs Committee Chairs regarding bills we dislike before a committee hearing is set for the bill.
- g) Meet with members of the House and Senate Environmental Affairs Committees at the beginning of session to review their legislation and any other environmental issues.
- h) Conduct weekly internal briefings during session for legislative team and Commissioner.
- i) Build on existing relationships and work on developing new relationships internally and externally in my role as IDEM's Business & Legislative Director.

**3) Expand Business Relations Office**

- a) Hire one person to assume role of the Business Liaison.

By: December 31, 2001

- b) Revamp the Business Relations portion and put together a Small Business Ombudsman work plan.

By: September 30, 2001

- c) Update and expand business portion of OBLR's web page.



## 8. OFFICE OF COMMUNITY RELATIONS

Karen Terrell  
 Director  
 Office of Community Relations  
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This office assists the general public, local and state government and community organizations with specific issues pending before the agency. OCR staff listens to community concerns and investigates and facilitates the resolution of issues. OCR staff assist in the operation of the Compliance and Technical Assistance Program (CTAP) and the CTAP portions of OCR are covered by the confidentiality requirements of [IC 13-28-3-4](#).

### A. OCR — Agency-Wide Priorities

#### 1) *1. Bi-Lingual Documents/Interpreters*

Provide translation services for staff and evaluate agency translation needs.

By: March 1, 2002

#### 2) *Speakers Bureau*

Identify staff & stakeholders, develop a marketing strategy and promote program to stakeholders.

By: April 1, 2002

### B. OCR — Office-Wide Priorities

#### 1) *Training*

- a) Office staff will take advantage of 4 learning experiences (tours of treatment facilities, emergency response, etc.) to increase awareness of environmental issues faced by Indiana communities

By: June 30, 2003

- b) Staff will complete all required trainings (i.e. sexual harassment, personnel rules).

#### 2) *Outreach & Communication:*

- a) General Public  
 (Ongoing activities)

- (1) Participate in various special events, including but not limited to the Governor's Conference on the Environment, Earth Week and the Indiana State Fair.
  - (2) Assist the Environmental Justice program to identify areas where collaboration is possible.
  - (3) Continue to promote IDEM/environmental issues through visits to schools around the State.
  - (4) Act as a resource to citizens in providing information or in connecting them with appropriate sources.
  - (5) Respond to citizen's complaints and concerns via "Governor's Letters" and track this information in order to identify important issues.
  - (6) Utilize "Governor's Letters" (responses) to promote IDEM/environmental issues, provide information to citizens about events of interest, and help citizens connect with appropriate resources.
- b) Activists/Environmentalists  
(Ongoing activities)
- (1) Continue to facilitate environmental group meetings.
  - (2) Engage more environmental group representatives to participate in environmental group meetings.
  - (3) Utilize "Governor's Letters" (responses) to raise awareness about, and promote, environmental group meetings.
- c) Local Government Officials (town, city, and county)  
(Ongoing activities)
- (1) Assist the Office of Enforcement by making courtesy calls to municipalities that will be issued Notices of Violation (NOVs).
  - (2) Work to increase communication with municipal leaders by increasing road trips and developing a possible site visit schedule between the Commissioner and the Environmental Circuit Rider.
  - (3) Work with municipal advocacy organizations (Indiana Association of Cities and Towns, Association of Indiana Counties, Rural Communities Assistance Program) to improve access of IDEM to local government officials.
  - (4) Face to face meetings/visits to at least 20-25 mayors around the State.
- d) IDEM Staff
- (1) Develop a "Speakers Bureau" internally that would act as a resource pool in providing information to the community when they request speakers.  
By: April 1, 2002
  - (2) Identify a contact person in each of IDEM's Offices to act a liaison between Community Relations and each Office.
  - (3) Internal development among other Office's staff members to promote OCR (i.e. attend their meetings, etc.).  
Ongoing

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## 9. OFFICE OF CRIMINAL INVESTIGATIONS

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Sandra Jensen  
Director  
Office of Criminal Investigations  
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The primary duty of IDEM's Office of Criminal Investigations is to investigate allegations of criminal violations of Indiana's environmental protection laws, and to prepare a case for presentation to the Prosecuting Attorney who has jurisdiction over the alleged violations.

- 1) *Evaluate and improve investigative tools, methods and educational opportunities to work with local prosecutors to bring environmental criminals to justice.***
- 2) *Foster involvement with the federal Environmental Task Force to bring environmental violators to justice.***
- 3) *Look into purchasing new computers for the Indianapolis office - enhancing the OCI Data Tracking System. Work with IT to determine needs.***
- 4) *Increase communication with IDEM divisions and other agencies to identify and enhance processes, forms, etc. to improve usefulness in enforcement proceedings.***
- 5) *Engage in activities and develop initiatives to provide increase understanding of OCI requirements and responsibilities, improved avenues of communication and enhanced inter-division cooperation resulting in more effective and proactive identification, investigation and prosecution of environmental crimes.***



## 10. OFFICE OF ENFORCEMENT

Felicia Robinson  
 Assistant Commissioner  
 Office of Enforcement  
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The Office of Enforcement's mission is to respond to violations with timely, quality enforcement actions that accomplish three (3) major goals:

- achieve compliance,
- deter future violations, and
- result in an improved environment.

### **1) Agency-Wide Compliance/Enforcement Team**

To actively and meaningfully participate on the Agency-Wide Compliance/Enforcement Team.

Measure of Success:

Meeting all agency-wide measures of success for the team.

### **2) Timely Enforcement**

To continue to improve timeliness of enforcement actions.

Measure of Success:

- 75% of all active cases are 1 year old or less.

Ongoing

- The number of cases more than 2 years old is 50 or less.

Ongoing

### **3) Enhance Case Manager Training and Expertise**

To cross-train case managers to be able to handle cases in several different environmental media.

Measure of Success:

A majority of all case managers in each section are cross-trained to handle cases in several different environmental media.

Each case manager has an ongoing training plan that aims to train that case manager in both substantive environmental regulation and practice as well as in the skills of document drafting and negotiation.

By: June 1, 2003 — Cross-training complete

### **4) Analyze and Streamline the Enforcement Folder Process**

Measure of Success:

Each step in the enforcement folder process is analyzed for "value added" and the process is revised based on that analysis.

Each section (where applicable) puts into place a formal system for tracking compliance with Agreed Orders.

By: June 1, 2002

### **5) Initiate Strategic Enforcement Initiatives**

Measure of Success:

Each enforcement program, in conjunction with the environmental programs, initiates a project targeting a specific environmental compliance problem and addresses it using both compliance and enforcement resources.

- (1) Air Program – OE Air Section will work with Air Compliance to “bundle” cases of violations of the new styrene emissions rule for media dissemination.
- (2) Hazardous Waste Program – OE Hazardous Waste Section will do enforcement follow-up on cases generated by industrial waste inspections of restricted waste sites\*.

\* A restricted waste site is defined in 329 IAC 10-2-159 as “a solid waste land disposal facility designed and operated to accommodate specific types of waste as specified in 329 IAC 10-9-4.” The Indiana Administrative Code (IAC) is online at [www.in.gov/idem/rules/index.html#iac](http://www.in.gov/idem/rules/index.html#iac)

- (3) Water Program – OE Water Section will enter into ☐ enforceable orders with the owners/operators of sanitary wastewater collection systems identified to have excessive sanitary sewer overflow events (SSO) events. OE Water Section will also work with Water Compliance to identify and focus efforts on a group of wetland mitigation projects that have not been completed as required.
- (4) Solid Waste Program – OE Solid Waste Section with ☐ work cooperatively with OLQ to target enforcement of high priority LUST sites where initial site characterizations have not been submitted and where abatement has not been performed as required.

By: June 1, 2003

### **6) Development of P2 SEP Guidance**

Measure of Success:

Provide step-by-step guidance for violators and IDEM staff in the development of P2 Supplemental Environmental Project (SEP) proposals and establish parameters for OPPTA involvement and support in evaluating the technical and financial aspects of SEPs.

By: June 1, 2002

### **7) Centralized Health/Safety Training Program**

- a) Establish and fully implement a consistent centralized Health and Safety Training program within IDEM to provide training in accordance with OSHA standard found in 29 CFR 1910.120.

By: July 30, 2002

- b) Get essential staff trained.

By: August 30, 2001

- c) Establish agency network of Health and Safety contacts.

By: September 31, 2001

- d) Establish a centralized staff group.

By: October 1, 2001

- e) Establish centralized medical monitoring.

By: March 30, 2002

- f) Implement medical monitoring for appropriate staff.

By: June 30, 2002





## 11. OFFICE OF LAND QUALITY

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The OLQ is charged with protecting public health and the environment by assuring planning for, and the proper handling and disposal of, wastes in Indiana; protecting the public in the event of chemical spills and other environmental emergencies; and addressing short and long-term cleanup projects at contaminated sites throughout the state.

The Assistant Commissioner and Deputy Assistant Commissioner work as a team to assure that sound environmental policies are developed and implemented relative to the protection and remediation of land in the State of Indiana. The Deputy Assistant Commissioner may focus on special initiatives while assisting the Assistant Commissioner in directing and supervising a large number of resources and staff.

### A. OLQ — Agency-Wide Priorities

#### 1) *Reduce Toxics*

##### a) Mercury Assessment and Evaluation

Research available OLQ information and identify key mercury contributors in Indiana and assemble best available mercury inventory.

By: December 31, 2002

##### b) PCB Inspections

Conduct PCB inspections to determine if a facility's use, handling, storage and disposal practices comply with the PCB regulations (40 CFR 761). As part of the inspection process, PCB sampling may be conducted for both enforcement purposes as well as for verification of PCB levels.

#### 2) *Water Quality*

##### Increase Focus on Groundwater Protection

##### a) Analyze existing data to develop groundwater monitoring strategy.

By: March 1, 2002

##### b) Develop a comprehensive approach to looking at groundwater data in the State and putting it together.

#### 3) *Building a Better IDEM*

##### a) Permitting

##### (1) Meet all mandated permit deadlines 100% of the time

##### (a) All rules promulgated for the Office of Land Quality by the Solid Waste Management Board, meet all the noticing outreach requirements pursuant to IC 13-14-8.

##### (2) Establish internal targets for review periods for all permits/approvals/licenses without statutory/rule deadlines and meet these 100% of the time.

By: June 30, 2002

- (3) Make final decisions on all pending operating permit renewals and remain current.
  - (a) Reduce confined feeding approval backlog by 100%  
By: March 31, 2002
  - (b) Reduce solid waste permit renewal by 100%.  
By: June 30, 2002
  - (c) Reduce RISC-contingent and non-RISC-contingent, hazardous waste closure plan, and enforcement backlog by 30%.  
By: June 30, 2003
- (4) Improve and foster innovation in permit processes
  - (a) Evaluate all permitting public notice processes with respect to enhancing public participation.  
By: June 30, 2002
  - (b) Revise permit processing protocols to be more consistent with the concept of Environmental Justice, including staff training and the delineation of EJ areas, and develop strategies for addressing permitting requests in EJ areas.  
By: June 30, 2003
- (5) Evaluate permit resources and made recommendations as needed to maintain effective permit programs.
  - (a) Evaluate air, wastewater, drinking water, and solid waste for further opportunities to establish general permits or permit by rule.  
By: December 1, 2001
  - (b) Establish schedule for identified opportunities and implement.  
By: June 30, 2003
  - (c) RCRA Corrective Action and RCRA Closure/Post-Closure  
Major initiative will be undertaken to streamline program objectives quicker. Focus will be on obtaining control of contaminated groundwater migration and preventing pathways to human health exposure. Possible changes will be identified to the program by December 20, 2001. Progress will be measured on positive decisions for the above indicators. Changes will be implemented on an agreed upon schedule.  
By: December 20, 2001 — Changes will be identified to the program
  - (d) Compliance/Enforcement Team  
Continue work of agency-wide Compliance/Enforcement Team to meet/communicate regularly to evaluate information and formulate agency-wide strategies and resource allocation.  
Through: June 30, 2003
- (6) Remediation Services  
Although IDEM's other "core" services are primarily preventive in nature, the Agency also has the responsibility to undertake the remediation of sites that have been contaminated by pollution. IDEM's work cleaning up sites under a variety of statutory and regulatory authorities is an ongoing and major commitment of resources. Examples of possible commitments include:

- (a) Fully implement the RISC policies and establish an ongoing process of science-based revisions to RISC policies.

By: March 30, 2002

- (b) Develop a GIS-based mode for geographic assessment of potential health risk as a decision-making/site prioritization tool in order to most efficiently and effectively direct our resources.

By: June 30, 2002

- (c) Using the above GIS-based model, target high human risk areas (not specific sites) in areas of high population density and low economic advantage.

By: January 30, 2003

- (d) Evaluate available resources and funding for completing state-driven cleanups and make recommendations as needed.

By: June 30, 2002

(7) Dis-Investments

- (a) Each office will create an inventory of specific functions.

By: October 1, 2001

- (b) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority, and/or under-funded activities.

By: November 1, 2001

- (c) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.

By: December 31, 2001

- (d) The above review will be repeated on the same schedule.

During: calendar year 2002

## **B. OLQ — Office-Wide Priorities**

### **1) Land Application**

Evaluate current Land Application activities and make a recommendation for a proposed compliance program.

By: September 1, 2001

### **2) RCRA Corrective Action**

Identify information needs to assess, and obstacles to assessing GPRA sites subject to RCRA Corrective Action in order to determine their impact on human health and groundwater.

By: August 1, 2001

### **3) Risk Integrated System for Closure**

a) Establish an efficient RISC workflow process.

By: September 1, 2001

b) Provide assistance with the review of risk assessments by monitoring contractor performance including developing guidance and providing training for the contractors.

By: October 1, 2001

c) Facilitate a RISC Symposium in April of 2002 to provide technical recommendations for revisions to the RISC Policy.

d) Evaluate the incorporation of risk assessments into the RCRA Closure Plan review process and remediation process and identify needed improvements.

By: March 1, 2002

### **4) CAFOs**

IDEM will work with Region 5 during calendar year 2001 to reach an agreement on the next steps and schedules for activities related to the NPDES program and federal CAFOs.

By: December 31, 2002

## C. OLQ — Branch Specific Priorities

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### 1) Remediation Branch

#### a) Site Assessment and Investigation

##### (1) Defense Environmental Restoration Program

Environmental cleanups will be completed at seven (7) of the fifty-eight (58) remaining Areas of Concern (AOCs).

During: Fiscal year 2002

##### (2) Superfund Program

Continue and/or begin three (3) site contamination studies (Remedial Investigations/Feasibility Studies)

Through / By: June 30, 2002

#### Target Sites:

- Third Site
  - Sugar Creek Sediment Site
  - Little Mississinewa Sediment Site
- ##### (3) Site Investigations Program
- Fifteen (15) integrated assessments and expanded site inspections per fiscal year.
  - Five (5) site reassessments per fiscal year.
  - Four (4) expanded site assessments per fiscal year.
  - Hazard Ranking System (HRS) package prepared as needed, within 180 days of notice to EPA.
  - Five (5) pre-CERCLIS screenings per fiscal year.
  - RCRA PA/VSIs reviews as needed.
- ##### (4) Brownfields Program
- ###### (a) The completion/review of up to ten (10) Brownfield Environmental Assessments (BEAs)/equivalent investigations for communities.
- By: June 30, 2002 — as requested
- ###### (b) Publish "Brownfield Bulletin"
- Quarterly
- ###### (c) The performance of up to 5 Indiana Brownfields Advisory Team (IBAT) workshops or the host/participant of other workshops/conferences/seminars as requested.
- By: June 30, 2002 — as requested

- (d) The development of an Environmental Justice (EJ) Plan for different types of assistance provided.  
By: January 1, 2002
  - (e) The marketing and referral of at least five sites to the Abandoned Tank Community Assistance Program (ATCAP) that are available for reuse to increase participation.  
By: June 1, 2002
  - (f) Coordinate with IDFA to develop criteria for the new 9 million grant program for petroleum contaminated brownfields sites.  
By: September 2001
  - (g) Continue to provide technical support and review of IDFA grant and loan applications on a semi-annual basis and technical documents as needed on an ongoing basis.  
Ongoing
  - (h) Continue to provide technical support and review for IDFA of grant applications and loans for the brownfields program.  
Ongoing
  - (i) Incorporate public participation requirements into technical and financial assistance processes.  
By: October 1, 2001
- (5) Defense Environmental Restoration Program  
Facilitate four (4) property transfers.  
During: Fiscal year 2002
- (6) Natural Resource Damages
- (a) Continue Natural Resource Damage Assessment Activities on Grand Calumet River.
    - Finalize Report of Assessment (incorporate Baseline Document; Sediment Injury Report; Invertebrate, Fish and Bird Bioaccumulation/Injury; Surface Water Injury; Ground Water Pathway).
    - Complete statistical evaluation of spatial variability of Sediment contamination.
    - Continue work on restoration compensation determination plan.
    - Work on development of primary and compensatory restoration plan.
  - (b) Continue Grand Calumet River Restoration Fund (GCRRF) Council work on remediation and restoration of West Branch Grand Calumet River.
    - Attend all scheduled council meetings (should be scheduled quarterly)
    - Explore cost sharing with USACE for 312a Feasibility Study (West Branch only)
    - Complete Statement(s) of Work for characterization of and develop remediation/restoration plan(s) for West Branch.
    - Complete characterization of Roxanna Marsh and develop remediation/restoration plan for the Marsh.

- Work with potentially responsible parties, public, and partners to complete outreach necessary for approval of plans and projects.

(7) NW Indiana Remedial Action Plan (RAP)

Support the development of indicators for each of the fourteen (14) Impaired Beneficial Uses.

By: June 30, 2002

(8) Abandoned Landfills Initiative

Perform site assessments of six (6) new abandoned landfills.

By: June 30, 2002

b) Cost Recovery

- (1) Support the evaluation of current cost recovery efforts and contribute to recommendations to senior management.

- (2) Evaluate the viability of recovering costs against Comprehensive Global Liability (CGL) insurance policies.

By: September 1, 2001

c) Site Remediation/Closures

(1) State Cleanup Program

(a) Manage Commissioner's Bulletin

- Refer five (5) sites to Site Investigations for rescoring.

By: June 30, 2002

- Evaluate ten (10) sites for potential delisting.

By: June 30, 2002

- Add sites to the Commissioner's Bulletin as necessary.
- Publish up to date Commissioner's Bulletin in the Indiana Register annually.
- Continue to initiate and complete each phase of cleanup at the following sites: Chippewa Av, Hoskins Manufacturing, GATX Rail, American Lead, Connersville Landfill, Albany Battery Case Dump, Amoco Oil Co.-Granger, J.I. Case, and Knauf Fiberglass.

(b) Immediate Removals

- Stabilize and mitigate immediate threats to human health and the environment.
- Respond to 100% of the immediate removal requests within five (5) days of referral.
- Refer to USEPA Region 5 Emergency Response Section and partner on those sites exceeding IDEM's resources.

(c) Management of Remedial Response sites.

- Evaluate 100% of all new sites referred to Remedial Response from Emergency Response to determine whether long term oversight is required and to establish priority.
- Issue fifty (50) no further action letters on sites that have completed all necessary response activities per fiscal year.

- (2) RCRA Correction Action  
Meet RCRA CA/GPRA commitments
- (a) Complete human health indicator for one (1) site.  
By: June 30, 2002
- (b) Complete ground water indicator for two (2) sites.  
By: June 30, 2002
- (c) Complete the following site specific interim milestones at these RCRA CA/GPRA sites:
- Dana Corp./BRC  
By: July 1, 2001 — RCRA Facility Investigation (RFI) initiated.  
By: January 1, 2002 — RFI will be completed and submitted to IDEM.
  - REA Magnet  
Internal review of RISK Assessment completed by staff by 07/01  
By: July 1, 2001 — Initiation of the RFI and Internal review of RISK Assessment
  - Guide Corp.  
By: April 1, 2001 — RFI initiated.  
By: July 1, 2001 — RFI report anticipated to be forwarded to IDEM for review.
  - Rolls Royce Corp.  
By: September 1, 2001 — Current Conditions Report (CCR) forwarded to IDEM.
  - BP Amoco  
By: July 1, 2001 — CA725 Human Exposure Environmental Indicator work sheet completed for IDEM review.  
By: May 1, 2001 — RFI initiated.
- Remaining portion of RCRA CA requirements are in Permits Branch Priorities*
- (3) Defense Environmental Restoration Program  
Initiate environmental cleanups at the fifty-eight (58) remaining AOCs and establish Operation and Maintenance at one (1) military base  
During: Fiscal year 2002
- (4) Superfund Program
- (a) Complete four (4) decision documents (Records of Decision, Record of Decision Amendments, or Explanation of Significant Differences)  
Target Sites:
- Continental Steel
  - Himco Dump
  - Four County Landfill
  - Third Site



By: June 30, 2002

- (b) Reach construction completion at three (3) sites.

Target Sites:

- Third Site Non-Time Critical Removal Action
- Tippecanoe Sanitary Landfill
- American Chemical Services – Upgrade of Water Treatment System

By: June 30, 2002

- (5) Continental Steel Superfund Project

- (a) Select RD/RA Oversight Contractor for Continental Steel Site.

By: September 1, 2001

- (b) Select Construction Contractor for Contract Unit 2 for Continental Steel Site.

By: October 1, 2002

- (c) Provide project oversight of construction activities for Contract Unit 1.

Through January 1, 2003

- (6) Voluntary Remediation Program

Increase the voluntary remediation program participation by fifty (50) sites each fiscal year.

By: June 30, 2002 — Participation increased to a total of four hundred (400) active sites.

By: June 30, 2003 — Participation increased to a total of four hundred fifty (450) sites.

- (7) LUST Program

Ensure mitigation of high priority conditions including, but not limited to, fire and explosion hazard, inhalation of vapors and ingestion of contaminated drinking water, and free product at 90% of all high priority sites within 90 days of high priority notification.

- (a) Approve eighty (80) Site Characterization Reports each fiscal year.
- (b) Approve one hundred twenty (120) Corrective Action Plans each fiscal year.
- (c) Approve two hundred (200) LUST closures each fiscal year.
- (d) Complete and implement final LUST Compliance Strategy.

By: July 1, 2001

- (e) Send 100 Violation Letters to responsible parties for non-compliance with LUST and/or other IDEM requirements.

By: June 30, 2003

- d) Pollution Prevention in Remediation Projects

- (1) P2 in remediation orientation training for staff remediation team.
- (2) Develop P2 remediation educational materials for interested parties.
- (3) Develop a P2 opportunities in remediation web page for public outreach.
- (4) P2 in remediation awareness training for internal and external workgroups.
- (5) Initiate an awareness program for P2 in the Voluntary Remediation Program.
- (6) Initiate an awareness program for P2 in the Brownfields program.
- (7) Devise recognition programs for successful implementation of P2 in remediation and redevelopment projects.

## 2) Permits Branch

Tom Linson  
Branch Chief, Permits Branch  
Office of Land Quality  
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- a) Hazardous Waste Permitting (Grant Commitments)  
Complete twelve (12) hazardous waste facility permitting actions per fiscal year, in accordance with the annual workplan. Permits will be issued in accordance with the process specified by hazardous waste management regulations and applicable non-rule guidance. Each permit issued will address corrective action requirements. Sites subject to corrective action that are not addressed by permit will be covered by an order in accordance with annual workplan schedules.

- (1) Facilities for which IDEM is planning to issue a RCRA decision (FY 01-02)

- Table 1: Facilities for which IDEM is planning to issue a RCRA decision (FY 01-02)

FACILITY	PERMIT ACTION	COMMENTS
US Crane, Crane	Final	Renewal
OWM, Ft. Wayne	Draft	Post-closure
ESSROC, Logansport	Draft	BIF Permit
HES, Indianapolis	Draft & Final	Class 3 Modification
Midwest Steel, Portage	Draft & Final	Renewal
Vopack USA Inc., Indianapolis	Draft & Final	Renewal
Eli Lilly, Tippecanoe Lab	Draft	Class 3 Modification
Reclaimed Energy, Connorsville	Draft & Final	Renewal

- (2) An annual workplan will be provided to USEPA Region 5 EnPPA coordinator for SFY 02-03.

By: July 1, 2002

- (3) RCRA Corrective Action – Meet RCRA CA/GPRA commitments

- (a) Complete human health indicator for one (1) site.

By: June 30, 2002

- (b) Complete ground water indicator for two (2) sites.

By: June 30, 2002

- Ulrich Chemical

By: October 2001— Complete 725 and 750 environmental indicators.

- Mason Corporation

By: June 2002 — Negotiate and sign Corrective Action Order.

- Arvin NAA, Inc.

By: June 1, 2002 — Receive revised RFI from Arvin and review for approval.

■ Slater Steel

By: December 1, 2001 — Negotiate and sign Corrective Action Order

By: June 1, 2002 — Slater completes Phase II of RCRA RFI

■ Alcoa Warrick

By: October 1, 2001— Evaluate sampling data and make 725 determination.

■ Corning Glass

By: July 2001 — Receive RFI Workplan from Corning.

By: October 1, 2001 — Complete review and approve RFI Workplan

■ GTI Corporation

By: June 1, 2002 — Continue offsite groundwater contamination delineation.

■ Newport Army Depot

By: June 1, 2002 — Continue sampling and remediation activities.

■ Rhodia

Ongoing through: June 1, 2002 — Soil and groundwater monitoring sampling.

Remaining portion of RCRA CA requirements are located in Remediation Branch Priorities

- b) Hazardous Waste Closure (Grant Commitment)  
Approve twelve (12) hazardous waste closure plans/certifications per fiscal year. Closure plans will be approved in accordance with hazardous waste management regulations and applicable non-rule guidance.
- c) Permitting  
Issue all permits within timeframes required by statute, and guidelines established by the Branch.
- d) Confined Feeding  
Implement the Workplan developed at a staff retreat to revise the confined feeding approval system to comply with new rule requirements. Identify and develop current operating procedures consistent with the new rule for confined feeding operations. Assist the Agency's Agricultural Liaison with IDEM outreach efforts to the regulated community in order to effectively communicate new requirements.

By: September 1, 2001

e) Solid Waste Landfill Permitting

- (1) Issue fifty percent (50%) of backlogged solid waste landfill renewals and closure/post-closure permits.

By: June 30, 2002

- (2) Issue all future renewals within 365 days.

### 3) Compliance Branch

Leah Foutty  
Branch Chief, Compliance Branch  
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- a) Spill Response  
Provide 24-hour a day response capability to ensure responsible parties report and clean up spills; and ensure 100% field response at Priority 1 releases.
- b) UST Inspections (Grant Commitments)
  - (1) Conduct underground storage tank inspections at 1,565 regulated facilities each year with a goal of 3,127.  
By: June 30, 2003
  - (2) Work to ensure all new and unregistered tanks are properly registered.
  - (3) Develop and implement a procedure for inventorying and environmentally securing abandoned UST's in Indiana.  
By: August 30, 2001
  - (4) Complete and submit to EPA Region 5 the Underground Storage Tank STARS report  
In: October 2001, October 2002, April 2002, and April 2003
- c) Technical Compliance Inspections (Grant Commitments)  
Conduct approximately three hundred (300) technical compliance inspections for hazardous waste treatment, storage and disposal facilities, including some Volatile Organic Compounds (VOC) tank system inspections; site sampling; landfill construction and closure inspections; comprehensive municipal solid waste landfill inspections; and construction inspections of confined feeding operations each fiscal year.
- d) Industrial and Hazardous Waste Inspections (Grant Commitments)
  - (1) Conduct industrial and hazardous waste inspections at facilities which manage industrial and/or hazardous waste, including inspections of industrial waste landfills; hazardous waste treatment, storage, and disposal facilities (including combustion/fuel blending facilities); and large and small quantity hazardous waste generators. The inspections of the hazardous waste treatment, storage, and disposal facilities will be conducted in accordance with the statutory annual inspection requirement. IDEM will annually meet or exceed the twenty percent (20%) inspection requirement of large quantity hazardous waste generators, as set forth by the Final FY 2002/2003 Office of Enforcement and Compliance Assurance Memorandum of Agreement Guidance, dated June 19, 2001. More specifically, we will inspect one hundred ninety-nine (199) large quantity generators (LQGs) and treatment, storage, and disposal (TSD) sites. In addition, we will inspect six hundred twenty (620) small quantity generators (SQGs). We will also inspect approximately nine-one (91) facilities with waste classifications.
  - (2) In conjunction with the Agricultural and Solid Waste Compliance Section, we will evaluate transfer stations to determine if an inspection program is warranted for these facilities.  
By: June 1, 2002

- e) **Pollution Prevention Activities**  
Promote P2 during compliance inspections by focusing on PBTs.  
Project objectives:
- (1) Identify PBTs
  - (2) Promote the reduction of selected PBTs
  - (3) Provide staff training
  - (4) Report P2 activities as follows:
    - The number of companies identified during inspections with selected PBTs
    - The number of referrals to CTAP and CMTI for additional follow-up
    - The distribution of materials
    - Inspector training
  - (5) Focus on Pollution Prevention as a means to enhance awareness of, and to reduce, specific bioaccumulative and toxic chemicals (PBTs).
  - (6) In coordination with the Office of Pollution Prevention and Technical Assistance, promote and enhance Pollution Prevention awareness with respect to PBTs with industrial waste generators, in order to reduce the amount of toxic chemicals used and as a result, toxic waste generated.
  - (7) Improve Pollution Prevention dialog with industrial waste generators by providing inspector training on Pollution Prevention opportunities for the specific PBTs.
- f) **Solid Waste Inspections**  
Conduct inspections of approximately one hundred twenty-six (126) solid waste sites, approximately one hundred fifty-five (155) septage land application sites, thirty-three (33) tire processor/storage sites, and approximately six hundred fifty (650) septage haulers.  
By: June 1, 2002
- g) **Participate in a Land Application Sludge/Compliance Program.**  
By: June 30, 2001 — Program to be initiated.
- h) **Agricultural Inspections**  
Inspect one thousand (1000) confined feeding operations each fiscal year.
- i) **PCB Inspection Program (Grant Commitment & EPA Commitment)**  
Conduct thirty-eight (38) PCB inspections each fiscal year.
- j) **IDEM Compliance/Enforcement Team**
- (1) Participate as a member of the IDEM Compliance and Enforcement Team and revise inspection commitments and protocols based on Team decisions.
  - (2) Participate in Multi-Media Inspections.

**4) Science Services Branch**

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Branch Chief, Science Services Branch  
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- a) Land Application Compliance Program  
Organize and perform sampling of sludge that has been permitted for land application at ten (10) permitted facilities. Results will be evaluated and reports provided to internal Land Application Compliance Task Force for inclusion in final report.  

By: August 1, 2001
- b) Health and Safety  
Develop and maintain a comprehensive health and safety program in all OLQ field-oriented programs. The program must:
  - (1) Assure compliance with OSHA and OLQ standards;
  - (2) Work with and assist Agency health and safety program;
  - (3) Provide for continuous improvement through frequent training modules, supervisor and staff feedback, field oversight, and on-the-job training.
- c) Great Lakes Initiative (GLI) – Grant Commitment  
Provide technical and mapping support for the RAP objectives by continuing to update databases monthly.
- d) RCRA Info  
RCRA information will be input into the RCRA Info database on a monthly basis.



**5) Rules, Planning and Outreach Section**

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Section Chief, Rules, Planning and Outreach Section  
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- a) Groundwater Quality Standards  
Evaluate and prioritize existing Land Quality rules for incorporation of Groundwater Quality Standards within 60 days of the Groundwater Rules being final adopted by the Water Board.
- b) Authorization
  - (1) Develop and seek authorization for the FY 2000 hazardous waste package.  
By: June 1, 2002
  - (2) Complete promulgation of the 2001 Hazardous Waste Update.  
By: May 1, 2002



## 12. OFFICE OF LEGAL COUNSEL

William Divine  
 Assistant Commissioner  
 Office of Legal Counsel  
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The Office of Legal Counsel (OLC) provides legal advice and representation to the Department of Environmental Management (IDEM). Most of the attorneys working in OLC are environmental law specialists, though some of the attorneys also specialize in contract and employment law in order to fully represent the legal needs of IDEM.

OLC is divided into four functional sections: Program Counsel, Rules and Legislation, Enforcement, and Litigation. Each attorney and many of the office's support staff are assigned to work in one of these four sections. Each section has a supervising attorney (section chief) who manages the responsibilities of the section.

### **1) Implementation of a Remediation Counsel Section in the Office of Legal Counsel**

This Section will provide legal counsel to all agency functions associated with cost recovery, including enforced site cleanups, voluntary remediations, brownfields, collections, and bankruptcies.

- a) Complete revisions to the cost recovery training manual for project managers (including coding instructions)

By: November 1, 2001

- b) Fully staff and integrate a Remediation Counsel Section within the Office of Legal Counsel

By: December 1, 2001

- c) Establish informal collections alternatives [i.e., besides sending something to the Attorney General's Office]

By: March 1, 2002

- d) Revise and/or develop agency and office procedures for implementing and tracking the various responsibilities of the Section

By: July 1, 2002

### **2) Development and implementation of improvements, for both internal and external needs, that will facilitate accessibility to agency public records.**

- a) Gather information for accessibility improvements

By: September 1, 2001

- b) Develop suggestions for accessibility improvements

By: November 1, 2001

- c) Evaluate suggested accessibility improvements, including those by outside contractors, and select appropriate improvements

By: January 1, 2002

- d) Begin implementation of improvements  
By: April 1, 2002
- 3) ***Development and implementation of a plan to recruit and retain the most competent attorneys.***
  - a) Gather information/suggestions for plan  
By: October 1, 2001
  - b) Identify recruiting/informational interview opportunities at law schools and job fairs  
By: December 1, 2001
  - c) Implement selected plan  
By: January 1, 2002
- 4) ***Development and implementation of a plan to improve OLC's data management and communication.***
  - a) Evaluate office data management needs  
By: October 1, 2001
  - b) Evaluate and decide upon appropriate data management system(s)  
By: December 1, 2001
  - c) Implement data management systems  
By: March 1, 2002
- 5) ***Rulemaking***

Continue Coordination with the Offices of Air, Water and Land Quality as to their progress in meeting sunset requirements.
- 6) ***Dis-investments***
  - a) The Office of Legal Counsel will create an inventory of specific functions.  
By: October 1, 2001
  - b) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or underfunded activities.  
By: November 1, 2001

## 13. OFFICE OF MANAGEMENT, BUDGET, AND ADMINISTRATION

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### A. Human Resources Management Office

The Human Resources Management Office provides services to IDEM staff in the areas of Employment and Recruiting, Equal Employment Opportunity, Employee and Labor Relations, Compensation, Benefits, Training and Development. Our mission is to provide quality customer service as it relates to each Human Resource function and to take positive steps toward ensuring the organization's success while closely following applicable state and federal employment law.

#### 1) *HR — Agency-Wide Priorities*

##### a) Dis-investments:

- (1) Each office will create an inventory of specific functions.  
By: October 1, 2001
- (2) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or underfunded activities.  
By: November 1, 2001
- (3) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.  
By: December 31, 2001
- (4) The above review will be repeated on the same schedule.  
During: calendar year 2002

##### b) Staff Speaker Series

- (1) Establish a speaker series on multimedia topics and cross-office information.  
By: September 30, 2001
- (2) Survey staff for topics.  
By: July 30, 2001

##### c) Training

- (1) Add at least 2 new training opportunities to our training curriculum.  
By: October 31, 2001
- (2) Research and present options to IDEM's senior leadership team for a Leadership Development Program.  
By: December 31, 2001

- (3) Implement the Leadership program.  
By: March 31, 2002
- d) Sick Leave Option  
IDEM will research and develop a program for donating sick leave to coworkers in need and solicit approval from State Personnel to run a pilot program.
  - (1) IDEM will research and develop a policy for donating sick time to coworkers in need.  
By: March 31, 2002
  - (2) IDEM will obtain approval to run a pilot program.  
By: June 30, 2002
- e) Fill Vacancies Quickly
  - (1) Provide “how to” guidance on quickly filling vacancies to all supervisors.  
By: July 31, 2001
  - (2) Create staffing goals for each supervisor.  
By: July 31, 2001
  - (3) Establish quarterly reports on vacancies.  
By: October 31, 2001

## 2) HR — Office-Wide Priorities

- a) Research and implement ways to market HR’s role as consultants and people who help the agency work smarter, as well as ways to eliminate the perception that HR’S role is that of dictatorship or law enforcement.  
By: December 31, 2001 — Research  
By: June 30, 2002 — Implement
- b) Develop and implement a regular schedule for a team of HR staff members to visit the three regional offices to provide consultation and training, and to build relationships with these customer groups.  
By: September 30, 2001— Develop and Implement
- c) Research and report on the ways to ensure that ES3 and Operations Staff positions are correctly classified.  
By: December 31, 2001 — Research and report
- d) Design and order “business cards” with information on HR and confidentiality of issues and employee concerns.  
By: September 30, 2001
- e) Set up a continuous job bank posting for hard-to-recruit positions, such as chemist positions.  
By: September 30, 2001
- f) Evaluate assigned job duties of all HR staff and make changes as necessary to more evenly distribute the workload.

By: December 31, 2001 — Evaluate

By: June 30, 2002 — Implement

- g) Evaluate effectiveness of phased New Employee Orientation program and make improvements where necessary. (Examples: provide hands on training on ACS on each new employee's first ACS submission Friday; determine how to ensure that employees do actually return for subsequent orientation sessions.)

By: December 31, 2001— Evaluate

By: March 31, 2002 — Implement

- h) Develop and implement Prevention of Sexual Harassment training class using IDEM staff from various program areas as presenters.

By: March 31, 2002

- i) Revise the agency Manager and Supervisor Training policy to include mandatory training on Cultural Diversity Awareness and Prevention of Sexual Harassment.

By: September 30, 2001

- j) Develop agency training policy for all employees, with mandatory classes to include New Employee Orientation (with mandatory follow-up phases) and Prevention of Sexual Harassment.

By: September 30, 2001

- k) Arrange for PeopleSoft to run specific reports needed by HR staff, and then transfer the HR employee database from Paradox to PeopleSoft.

By: December 31, 2001

- l) Implement and coordinate quarterly HR office cleanup days (relates to liveable environments).

By: September 30, 2001

- m) Purchase items for recruiting, including IDEM polo shirts and/or professional name tags to be worn by HR staff and volunteers at recruiting events AND items to be given away at recruiting events, such as pens, key chains, etc. with IDEM logo.

By: August 31, 2001

- n) Develop and implement year-round paid and unpaid internship programs (separate from Governor's Summer Internship Program).

By: December 31, 2001

- o) Research and report on the feasibility of developing and implementing a new performance appraisal system (include whether it would compliment or replace the state's performance appraisal system).

By: June 30, 2002

## B. Office of Business Services

The Division of Business Services encompasses a wide range of specialty services for the Indiana Department of Environmental Management.

The offices included in this division are:

- Information Technology,
- Administrative Services,
- Distribution, Purchasing, and
- Contracts Administration.

These offices are critical to the daily internal operations of IDEM. As the agency grows, and during expansion into regions of Indiana, these offices are responsible for all communication functions, and purchasing goods and services via procurement or contractual methods. In addition, staff are dedicated to making offices functional and comfortable for employees and the public.

### **1) Business Services — Agency-Wide Priorities**

#### **a) Dis-investments:**

- (1) Each office will create an inventory of specific functions.  
By: October 1, 2001
- (2) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or underfunded activities.  
By: November 1, 2001
- (3) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.  
By: December 31, 2001
- (4) The above review will be repeated on the same schedule.  
During: calendar year 2002

#### **b) Shared Drive vs. Intranet**

Evaluate the need for an Intranet system or reorganizing the Shared Drive.

By: December 1, 2001

#### **c) Data Integration**

- (1) Develop Place Components of Core Data Model  
Review the agency's inventory of place information, document data maintenance, procedures/rules, develop maintenance application components and migrate existing locational data into the core model. Migrating only locational data that is not currently stored in legacy systems. Legacy systems' place data will be migrated with the system as a whole.  
By: January 30, 2002
- (2) Populate the People/Organization Components of the CORE Data Model
  - (a) Migrate FLA Data set to IDEM Core Data Model and update the federal systems automatically. Working with EPA, develop a strategy and implementation plan to maintain EPA's master facility system, as a function of Internal CORE data model maintenance.  
By: December 31, 2001
  - (b) Develop a system to maintain and associate interested parties with OAQ permit decision to ensure that interested parties are properly notified as a permit of interest to them goes through it' public process.



By: March 30, 2002

- (c) Develop a web-based application to allow citizens to register and create personal profiles to manage their information requests (print publications, notices, etc.) from IDEM.

By: May 30, 2002

d) Internal Processes

- (1) Create a “how to” manual for requisitions.

By: November 1, 2001

- (2) Develop appropriate requisition training for staff.

By: January 31, 2002

- (3) Establish and implement turnaround timeframes for requisition processing.

By: March 1, 2002

- (4) Fully utilize Asset Management System within PeopleSoft.

By: June 30, 2002

**2) Business Services — Office-Wide Priorities**

a) Administrative Services

- (1) Establish/Update Administrative Service’s Standard Operating Procedures.

By: November 1, 2001

- (2) Purchase and implement an automated system to help streamline the Distribution Center delivery process.

By: January 1, 2002

- (3) Establish an informational media to improve internal information sharing relative to facility and property management issues and/or projects. This will help to improve communication with regional and satellite offices regarding facility and property management issues and/or projects.

By: June 1, 2002

b) Purchasing

- (1) Modify the IDEM PeopleSoft manual to be more user-friendly. Manual should be a user-friendly first stop reference for users before calling purchasing staff.

By: September 1, 2001

- (2) Promote awareness of the PeopleSoft manual on the shared drive for staff and improve its ease of use (PeopleSoft user).

By: October 1, 2001

- (3) Create an awareness of requisition procedures for the entire agency by developing a requisition procedure manual for inclusion in the agency SOP’s.

By: November 1, 2001

- (4) Create an agency-wide requisition tracking system that can easily be accessed by all IDEM staff and which does not require PeopleSoft access rights.

By: January 1, 2002

- (5) Establish and implement acceptable turnaround times for requisitions to be processed.

By: March 1, 2002

c) Contracts

- (1) Designate and train a person as the contracts back up.

By: August 1, 2001

- (2) Place guidelines on the Shared drive for agency staff to determine if a contract is a procurement contract or a professional services contract.

By: September 1, 2001

d) Information Technology Client Services Team

- (1) Establish a funding pool for developers.

By: September 1, 2001

- (2) Develop a plan to complete the conversion from Corel to MS Office.

By: October 1, 2001

- (3) Develop and implement an orientation process for new IT staff. This will allow new IT staff members to be more familiar with the other IT sections and their issues/operation procedures.

By: December 1, 2001

- (4) Increase IT accountability for development activities (e.g., all major development activities should be managed by IT).

By: March 1, 2002

e) Information Technology Help Desk

- (1) Reorganize the Help Desk as a resource center for one-stop information.

By: September 1, 2001

- (2) Create and implement an orientation plan/package for the Help Desk Team.

By: December 1, 2001

- (3) Cross-train all Help Desk Staff.

By: December 1, 2001

- (4) Implement and utilize all of HelpStar's features to maximize customer service at the Help Desk. (Standard Solutions, reporting, etc...)

By: January 1, 2002

- (5) Information Technology Infrastructure Team

- (a) Develop Oracle database policies and procedures. Create documentation on database administration for distribution to IT staff.

By: December 31, 2001

- (b) Develop plan to implement new UNIX hardware and software.

By: December 31, 2001<sup>6</sup>

- (c) Obtain additional training certification/authorization for GIS Coordinator. This will allow the GIS Coordinator to share knowledge gained while working with other GIS participants within the agency and outside IDEM.

By: December 31, 2001

- (d) Migrate to NetWare 5.x.

By: June 30, 2002

## C. Office of Fiscal and Accounting

### 1) *Fiscal and Accounting — Agency-Wide Priorities*

- a) Dis-investments:

- (1) Each office will create an inventory of specific functions.

By: October 1, 2001

- (2) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or underfunded activities.

By: November 1, 2001

- (3) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.

By: December 31, 2001

- (4) The above review will be repeated on the same schedule.

During: calendar year 2002

- b) Paying the Bills

Establish and meet expectations for all payments.

- (1) Establish turnaround timeframes for payment of claims, SDO claims, Travel Reimbursements, and Purchase Order Payments.

By: September 30, 2001

- (2) Develop appropriate training on the following administrative topics:

- Travel training

By: September 30, 2001

- Petty Cash training

By: October 31, 2001

- SDO Claims

<sup>6</sup> Plan completed by 12/31/01 to give us room for delivery and coordination but should be done before we get the equipment in. Implemented timelines will be based on plan.

By: October 31, 2001

- Claims Process training

By: December 12, 2001

- Chartfielding

By: December 31, 2001

- Purchase Order Processing

By: March 31, 2002

c) **Billing & Accounts Receivable**

Establish consolidated agency-wide billing and accounts receivable function.

- (1) Load and maintain all accounts receivable on PeopleSoft.

By: July 1, 2001

- (2) Create policy team to determine agency billing and collection policies.

By: August 1, 2001

- (3) Standardize agency policies regarding all billings and collections activities.

By: September 30, 2001

- (4) Centralize and streamline processing of all agency invoices using PeopleSoft.

By: July 1, 2002

d) **Cost Recovery**

Continue the agency focus on recovering costs from potentially responsible parties.

- (1) Develop a plan for cost recovery efforts (Legal, Land and Accounting).

By: July 30, 2001

- (2) Implement plan.

By: January 30, 2002

- (3) Set a financial goal for FY 2002.

By: August 30, 2001

- (4) Set financial goal for FY 2003.

By: August 30, 2002

- (5) Meet financial goal for FY 2002.

By: June 30, 2002

- (6) Meet financial goal for FY 2003.

By: June 30, 2003

**2) Fiscal & Accounting — Office-Wide Priorities**

a) **Accounts Payable**

- (1) Partner with State GMIS office and other agencies in order to automate the G-10 process through PeopleSoft.  
By: June 30, 2002
- (2) Partner with State GMIS office and other agencies in order to automate the in-state travel reimbursement process through PeopleSoft.  
By: June 30, 2002
- (3) Partner with State GMIS office and other agencies in order to automate the training request process through PeopleSoft.  
By: June 30, 2002
- (4) Participate in State Wide procurement card program and pilot.  
By: Dependent on schedule developed by IDOA
- (5) Participate in State Wide e-procurement program and pilot.  
By: Dependent on schedule developed by IDOA
- (6) Complete workflow charts along with policies and procedures; publish them on the shared drive and Agency web page.
  - (a) Who's Who  
By: September 30, 2001
  - (b) Policies  
By: December 31, 2001
  - (c) Flowcharts  
By: March 30, 2002
- (7) Develop guidelines for turnaround time for the payment of:
  - Claims
  - SDO Claims
  - Travel Reimbursements
  - PO paymentsBy: September 30, 2001
- (8) Develop additional training opportunities for IDEM staff (program staff) such as:
  - Travel  
By: September 30, 2001
  - Claims Process  
By: December 31, 2001
  - Petty Cash  
By: October 31, 2001
  - PO processing with purchasing  
By: March 31, 2002

- SDO claims

By: October 31, 2001

- Coding class

By: December 31, 2001

b) Grant Management

- (1) Complete training and implementation of grant management program.

By: October 31, 2001

- (2) Issue initial report on grants management program assessing strengths and weaknesses along with any recommendations for changes and/or modifications to the program.

By: December 31, 2001

- (3) Develop and implement a plan to address areas needing attention as noted in the report.

By: March 31, 2002

- (4) Review plan and issue final report noting any further action items.

By: June 30, 2002

c) MBE/WBE

- (1) Complete review and audit current agency MBE/WBE program.

By: September 30, 2001

- (2) Issue a report detailing successes and deficiencies of the program.

By: October 31, 2001

- (3) Develop a revised agency policy and program for MBE/WBE including goals, training, outreach performance reviews and audits.

By: December 31, 2001

- (4) Complete implementation of revised program and initial training.

By: June 30, 2002

d) Multi Program Transfers

- (1) Review and Audit current Time & Effort Multi Program Plan (MPT) process.

By: September 30, 2001

- (2) Develop flow charts and procedures as a result of the review and audit of MPT process.

By: November 15, 2001

- (3) Develop alternative scenarios and test each one, measure results.

By: December 31, 2001

- (4) If an alternative method achieves desired results develop implementation plan and associated timeline.

By: March 31, 2002

- (5) Implement alternative method and monitor results.

By: June 30, 2002





## 14. OFFICE OF MEDIA AND COMMUNICATION SERVICES

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The Office of Media and Communications Services is IDEM's communications team. We serve program areas by communicating policy, environmental requirements, information, decisions, and pertinent news to the public and IDEM stakeholders through publications, electronic information services, the mass media, conferences and special events. MACS also distributes information internally to inform IDEM employees about issues and initiatives that affect them or their jobs.

### A. MACS — Agency-Wide Priorities

**1) Each office will create an inventory of specific functions**

By: October 1, 2001

**2) Each function will be evaluated by a qualitative system developed to identify discretionary, low-priority and/or under-funded activities.**

By: November 1, 2001

**3) Evaluate the need for an Intranet or reorganizing the Shared Drive, developing list of "Pros/Cons," cost and manpower needs.**

By: December 1, 2001

**4) Identify pages recommended for removal from agency Web site, including number of hits per pages.**

By: December 1, 2001

**5) Create feedback for improvements.**

By: December 1, 2001

**6) Develop standard Fact Sheets on environmental issues and controversial subjects to be used by staff as well as the public.**

By: June 1, 2002 — 50 Fact Sheets

**7) Develop process for receiving comments on the Web sites, bilingual services and general services provided by Agency.**

By: March 1, 2002

## **B. MACS — Office-Wide Priorities**

- 1) ***MACS will write responses to op-ed articles that appear in statewide newspapers and/or publications.***  
Begins immediately.
- 2) ***MACS will write one op-ed piece each month, sending the article to selected newspapers in Indiana.***
- 3) ***MACS will develop a Web page to highlight IDEM's priorities once they are delivered.***
- 4) ***MACS will redesign the electronic version of Indiana Environment.***  
By: TBA
- 5) ***MACS will develop a response to the IDEM Communications Survey.***  
By: TBA
- 6) ***MACS will continue to develop, write, edit and publish up to four special inserts a year for Indiana Environment, beginning with the September-October 2001 issue.***
- 7) ***MACS will begin to offer Inside IDEM in an HTML format.***  
By: July 1, 2001
- 8) ***Redesign the MACS – Media Team Web site to make it more user-friendly to the News Media.***  
By: January 1, 2002
- 9) ***Develop and maintain fact sheets from Air, Land, Water and OPPTA for staff, reporters and citizens. Original goal: 50 fact sheets.***  
By: June 1, 2002
- 10) ***Investigate and select the most appropriate method for managing and distributing IDEM media clippings.***  
By: January 1, 2002
- 11) ***Combine the IDEM Annual Report and the State of the Environment into a single publication, entitled "Indiana's Annual State of the Environment Report"***  
By: Spring, 2002
- 12) ***Migrate the remainder of IDEM's offices to the new Web site look.***  
By: January 1, 2002
- 13) ***Establish a plan that will reduce the number of pages on our Web site.***  
By: June 1, 2002
- 14) ***MACS staff takes over teaching of media training class.***

## 15. NORTHERN REGIONAL OFFICE

Terry Coleman  
Director  
Northern Regional Office  
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The Northern Regional Office brings many services of the Indiana Department of Environmental Management to the citizens and communities of Northern Indiana. Serving the counties of DeKalb, Elkhart, Fulton, Kosciusko, LaGrange, Marshall, Noble, St. Joseph, Starke and Steuben, the Northern Office helps to bring state environmental assistance from the state capital in Indianapolis to Northern Indiana residents, municipalities, counties, and planning districts.

Providing access to local permits, inspection reports, and general environmental information is but one of the areas of support that we bring to our region; local compliance and technical assistance to industries and groups starting to build, expand, or diversify their plants, and initiating and developing outreach services in environmental issues are among other services we provide.

In addition, staff of the Northern Regional Office answer questions from the public on a wide range of environmental subjects and represent the environmental community at important gatherings.

### **1) Complete Northern Regional Office portion of the Office of Air Quality's Air Compliance Section's compliance goals.**

By: June 30, 2002

- a) Inspect 150 major air sources including T5, FESOP, and NESHAP.

By: June 30, 2002

- b) Investigate 100% of air complaints concerning the Northern Region.

During: Fiscal year

### **2) Complete Northern Regional Office portion of the Office of Air Quality's Asbestos Section's compliance goals.**

By: June 30, 2002

- a) Inspect at least 80% of the asbestos notifications sent to the NRO by the Asbestos Office in Indianapolis.
- b) Administer third party lead examinations for all Lead Inspector, Risk Assessor, and Supervisor applicants in the Northern Region.
- c) Investigate 100% of asbestos complaints no later than next working day.

### **3) Complete Northern Regional Office portion of the Office of Land Quality's Industrial Waste Compliance Section's compliance goals.**

By: June 30, 2002

- a) Inspect four operating TSD facilities in the Northern Region.

By: June 30, 2002

- b) Inspect 33 Large Quantity Generators.

By: June 30, 2002

- c) Inspect 25 Small Quantity Generators.

By: June 30, 2002

- d) Investigate 100% of industrial waste complaints concerning the Northern Region.

During: Fiscal year

**4) Complete Northern Regional Office portion of the Office of Land Quality's Agricultural and Solid Waste Compliance Section's compliance goals.**

By: June 30, 2002

- a) Inspect 100% of Regional solid waste facilities including landfills, transfer stations, restricted waste sites, construction/demolition sites, and permitted incinerators.

By: June 30, 2002

Type	Quantity	Inspection Frequency
Landfills	5	Semi Annual
C/D Sites	1	Semi Annual
RWS	3	Semi Annual
Trans Station	5	Semi Annual

- b) Inspect 100% of about 64 (plus) Regional septage haulers and about 90 Regional Septage Trucks.

By: June 30, 2002

- c) Inspect 100% of about 43 regional permitted land application sites.

By: June 30, 2002

- d) Inspect 100% of the EPA list of Regional Confined Feeding Operations sites for compliance.

By: June 30, 2002

- e) Investigate 100% of solid/agricultural waste complaints concerning the Northern Region.

During: Fiscal year

**5) Complete Northern Regional Office portion of the Office of Water Quality's Wastewater Section's compliance goals.**

By: September 30, 2002

- a) Inspect 100% of major NPDES facilities in the Northern region on the annual list of IDEM / EPA EnPPA commitments for CSOs, SSOs and Major CEIs.

By: September 30, 2002

- b) Conduct 250 site visits and reconnaissance inspections, including those listed in a) above, in the Northern Region.

By: September 30, 2002

- c) Investigate 100% of wastewater complaints concerning the Northern Region.

During: Fiscal year

**6) Complete Northern Regional Office portion of the Office of Water Quality's Drinking Water Section's compliance goals.**

By: September 30, 2002

- a) Inspect 100% of the Community Public Water Systems listed by the SDWIS system in the Northern Region.

By: September 30, 2002

- b) Conduct 300 site visits of community, transient and non-transient water supplies in the Northern Region.

By: September 30, 2002

- c) Locate, investigate, and register 30 new public water supply sources in the Northern Region, through personal effort and with the help of the NRO Multimedia team.

By: September 30, 2002

- d) Investigate 100% of drinking water complaints concerning the Northern Region.

During: Fiscal year

**7) Complete Northern Regional Office portion of the Office of Pollution Prevention and Technical Assistance's goals.**

- a) Provide 150 Northern Region corporate clients with quality on-site technical assistance.

By: June 30, 2002

- b) Promote the Governor's Awards for Excellence in Recycling, and for Pollution Prevention.

- c) Provide assistance to local communities with recycling and other OPPTA grants.

**8) Assist IDEM's Office of Land Quality's Remediation Services Branch in any of their activities and goals in the Northern Region.**

During: Fiscal years 2002 and 2003

**9) Assist IDEM's Policy, Planning and Assessment Office Branch in any of their activities and goals in the Northern Region.**

During: Fiscal years 2002 and 2003

**10) Develop and lead public participation events at local schools and parks during Earth Week and other events during the year.**



## 16. NORTHWEST REGIONAL OFFICE

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 Director  
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Some of the state's most serious environmental challenges lie in Lake, LaPorte and Porter counties in Northwest Indiana. A century of spills, emissions and discharges to the environment required government to respond with comprehensive, regionally coordinated programs. In 1991, IDEM opened a regional office in Gary to act as a liaison with local officials, concerned citizens, and industry. Today, the Northwest Regional Office has expended its service to assist Starke, Pulaski, Newton and Jasper counties in some areas of environmental compliance. Northwest Regional Office staff communicate agency programs and rules to the public; address issues through a multi-media lens; and participate in various regional environmental planning efforts.

### A. NWRO — Agency-Wide Priorities

#### 1) *Water Quality - Promote Watershed Approach*

Complete TMDLs scheduled for 2002 and 2003 and submit to EPA

#### 2) *Reduce Toxics - Target Northwest Indiana*

- a) With public input, determine projects for spending BP Amoco CD \$. Develop implementation schedules and implement according to schedule.
- b) Work with USEPA to complete the Cumulative Risk Initiative (CRI). Using CRI data about air quality in Lake County, explore the possibility of targeted voluntary emission reductions from local industries.
- c) Help the Lake County Lead Abatement Task Force continue to provide outreach and help propose abatement projects.
- d) Northwest Indiana Diesel Initiative  
Produce report of activities to date, including results of recent survey and recommend next steps.

#### 3) *Building a Better IDEM*

- a) Regional offices
  - (1) Make Recommendations and gain approval from Commissioner on added services for the Regional Offices.  
By: September 30, 2001
  - (2) Implement added services.  
By: December 31, 2001
  - (3) Evaluate added services.  
By: June 30, 2002
  - (4) Conduct review and make recommendations for improved Regional Office and Air, Water and Land office "operating procedures."  
By: March 31, 2002

- b) Compliance Continuum  
Ensuring that all regulated entities comply with all applicable environmental laws and regulations, permits, and orders is at the heart of the IDEM's mission. The compliance continuum begins with the outreach and compliance assistance function, proceeds to the inspection and compliance monitoring functions and ends with the use of enforcement for those regulated entities who fail to comply with the law.
- c) Dis-investments
  - (1) Each office will create an inventory of specific functions.  
By: October 1, 2001
  - (2) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or underfunded activities.  
By: November 1, 2001
  - (3) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.  
By: December 31, 2001
  - (4) The above review will be repeated on the same schedule.  
During: calendar year 2002



**B. NWRO — Office–Wide Priorities****1) Assist With Regional Planning**

Northwest Regional Staff provide technical assistance to the Northwest Indiana Advisory Board; the Northwestern Indiana Regional Planning Commission's Environmental Management Policy Committee; the Citizens' Advisory for the Remediation of the Environment; the Northwest Indiana Forum Environment Committee; the Lake Michigan Marina Development Commission; the Shoreline Development Commission; the South Shore Clean Cities committee; the Bethlehem Steel Citizens' Advisory Committee; the BP Citizens' Advisory Committee; the Valparaiso Chain of Lakes group; and the Quality of Life Council.

**2) Improve Northwest Indiana Air Quality**

- a) Compliance Review and Inspections  
Inspect 95% of all major sources, including Title V and FESOP sources. Respond timely to complaints. Enforce the asbestos NESHAP and the lead-based paint regulations. Proctor lead training course testing and examinations. Help enforce compliance with Clean Fuel Fleet program.
- b) Encourage Voluntary Reductions  
Implement Partners for Clean Air program, a partnership effort to reduce ozone emissions in Lake, Porter and LaPorte Counties. Coordinate program with Northwestern Indiana Regional Planning Commission and South Shore Clean Cities. Represent IDEM in the Chicagoland Clean Air Dialogue; report information back to Indiana partners. Help EPA negotiate voluntary reductions through the Cumulative Risk Initiative.
- c) Obtain Information Through Ambient Air Monitoring Network  
Operate ambient air monitoring network in accordance with state and federal guidelines to provide timely and accurate air quality data.

**3) Protecting Northwest Indiana Land**

- a) Spill Response  
Provide 24-hour response capability to ensure responsible parties report and clean up spills; ensure 100% field response at Priority 1 releases. Help brownfields and site remediation project managers with sites in Lake, Porter and LaPorte.
- b) Underground Storage Tank Inspections  
Conduct underground storage tank inspections at regulated facilities and work to ensure all new and unregistered tanks are properly registered. Investigate complaints.
- c) Leaking Underground Storage Tank  
Review progress of remediation at high priority sites. Investigate complaints.
- d) Industrial and Hazardous Waste Inspections  
Conduct industrial and hazardous waste inspections at facilities that manage industrial and/or hazardous waste, including inspections of industrial waste landfills; hazardous waste treatment, storage, and disposal facilities (including combustion/fuel blending facilities); and large and small quantity hazardous waste generators. Conduct PCB inspections.
- e) Solid Waste Inspections  
Conduct inspections of solid waste landfills, septage land application sites, and septage haulers. Participate in a Land Application Sludge/Compliance Program. Inspect confined feeding operations.

**4) Protecting Northwest Indiana Waters**

- a) Compliance Review and Inspections

Investigate complaints. Ensure compliance of facilities under an Agreed Order or Consent Decree. Complete all commitment inspections. Routinely inspect wastewater treatment plants that have combined sewer overflows. Track facilities' progress in complying with CSO long-term control plans. Conduct stormwater inspections. Review draft NPDES permits; use compliance inspection information to assist permit writer in developing permit requirements.

b) Great Lakes Basin Planning

Continue participating in Lake Michigan Lakewide Management Plan. Continue managing the Interagency Task Force for E. coli. Help develop Total Maximum Daily Load (TMDL) models for tributaries in Lake Michigan basin; complete Grand Calumet River TMDL. Provide guidance for watershed and sub-watershed planning efforts, including Little Calumet River, Kankakee River, Salt Creek, and Beauty Creek. Manage Grand Calumet River, Indiana Harbor Ship Canal and Nearshore Lake Michigan Remedial Action Plan (RAP). Update Stage 2.5 RAP; establish goals, objectives and environmental indicators; and propose a RAP monitoring network. Delist one beneficial use impairment. Participate in Great Lakes planning via Great Lakes Water Quality Board.

**5) Promote Pollution Prevention In Northwest Indiana**

a) Compliance Assistance

Provide compliance assistance to all confidential assistance phone calls. Provide compliance assistance for all on-site visits. Help conduct regional workshops for child care facilities, vehicle maintenance shops and dry cleaning facilities.

b) Education and Outreach

Continue to develop and distribute educational materials through public outreach and training sessions; focus on environmental requirements, compliance methods, voluntary environmental audits, and pollution prevention technologies. Participate in mercury steel workgroup. Coordinate mercury education with schools and solid waste management districts. Coordinate mercury thermometer exchange programs. Conduct Integrated Pest Management workshops. Provide assistance and conducts sites visits with 1 -5 star child care facility applicants. Participate in diesel emissions work group. Participate in regional asthma work group. Participate in Lake County Lead Task Force; lead Interim Measures subcommittee. Help the Lake County Lead Task Force provide education and outreach to the community. Present training opportunities to health departments and contractors regarding interim controls and case management.

## 17. OFFICE OF PLANNING AND ASSESSMENT

Paula Smith  
 Director  
 Office of Planning and Assessment  
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The IDEM Office of Planning and Assessment directs IDEM's planning and assessment activities to support the agency mission and agency-wide priorities. The Office directs the development of short and long-term plans for the agency and guides agency-wide priorities that require coordination amongst IDEM's media and support offices.

The OPA also coordinates with state agencies and the U.S. Environmental Protection Agency on environmental strategies and planning.

### A. OPA — Agency-Wide Priorities

#### 1) *OPA as Agency Leader in Data Integration*

##### a) Infrastructure

- (1) Build Project Management Skills of Staff
- (2) Acquire and deploy a centralized project management application to allow multiple users access and tracking of the multiple projects in OPA.

By: December 31, 2001

- (3) Schedule project management training for OPA Staff.

By: June 30, 2002

##### b) Communicating Environmental Information & Connecting with Communities

#### 2) *Agency Enterprise Data System*

- a) Develop a plan and assess our agency efforts to bring all agency databases into one multi-media system. This will include a complete assessment of IDEM's existing applications and databases (i.e. all major permit/compliance databases). The plan will consider cost, time requirements, and migration impacts on current users.

By: January 31, 2002

##### b) Develop Place Components of Core Data Model

Review the agency's inventory of place information, document data maintenance, procedures/rules, develop maintenance application components and migrate existing locational data into the core model.

By: January 31, 2002

##### c) Populate the People/ Organization Components of the CORE Data Model

As a part of our agency system, pilot a project to maintain and associate interested parties with OAQ permit decision to ensure that interested parties are properly notified as a permit of interest to them goes through its public process.

By: March 30, 2002

- d) Develop a web-based application to allow citizens to register and create personal profiles to manage their information requests (print publications, notices, etc.) from IDEM.

By: May 30, 2002

- e) Migrate Facility Linking Application (FLA) Data set to IDEM Core Data Model.

By: May 30, 2002

- f) Develop process to maintain/populate EPA's systems with IDEM data utilizing our new data system.

By: December 31, 2002

- g) CORE Team Activities

- (1) Provide support and ensure that new data integration projects are consistent with Enterprise Data Management Policy on a continued basis.
- (2) Drive the development of database integration work plans for existing databases as called for in the Enterprise Data Management Policy.

### **3) Sharing Enterprise Information Externally**

Develop strategy and implementation plan to provide map-based access to IDEM systems.

- a) SAVI

Review and identify technology opportunities and requirements/standards for using and sharing data with SAVI member (Indiana Public Service Organization).

By: December 31, 2001

- b) Environmental Justice

- (1) Work with EJ staff to identify potential system functionality to enhance public access to information.

By: June 30, 2002

- (2) Pilot Notification System

Develop system to allow EJ community to establish interest profiles, receive automatic notification about activities of interest, and allowing electronic comment submissions.

- c) Technical Workgroups/National Forums

- Participate in DPOC standardization exercises/taskforces
- Electronic Reporting Submissions
- Signatures- Digital/Electronic
- Electronic Document Management/FOAI Requests
- ECOS/EPA Based Standardization Exercises
- Central Data Exchange Partnership
- Data Transfer Partnership with EPA FLA/FRS groups and States
- Locational Data Improvement Project (LDIP) coordinate collection

### **4) Improve Information Sharing**

- a) Electronic Submittal

Continue to investigate and evaluate the feasibility of online permit application submittal and the use of electronic signatures. Additionally, investigate in alternative form text capture

technologies that can be applied to hand-written forms (i.e. Optical Character Recognition), and examine the feasibility of database capture of form data from within the agency.

b) Online Permitting

Continue working with the program areas to convert agency forms to fillable PDF format. Act as a liaison between State Forms Management and the program areas for the production of new permit application forms, and for the maintenance of revised, Forms Management approved permit application forms. As requested by contacts within the program areas, maintain and make changes to forms already Forms Management approved and converted over to the new format.

(1) Revise the following OAQ lead and asbestos permit and license application forms:

- Application for Individual Asbestos License
- Notification of Asbestos Demolition and Renovation Operations
- Application for Individual Lead License
- Notification of Lead Abatement Activity
- Application for Asbestos Contractor License
- Application for Lead Contractor License
- Application for Lead-Based Paint Training Course Provider Approval
- Application for Duplicate Lead License
- Application for Duplicate Asbestos License
- Application for Asbestos Training Course Provider Approval

By: February 1, 2002

(2) Finish the OAQ Title V permit application package (approx 300 pages).

By: June 1, 2002

(3) Revise solid waste permit application forms and form packages, as follows:

- Solid Waste Minor Modification Application Packet-Land Disposal Facilities
- Solid Waste Minor Modification Application Packet-Processing Facilities
- Solid Waste Closure Plan/Post-Closure Plan Forms & Instructions
- Solid Waste Facility Permit Fee Transmittal Form #47215
- Solid Waste Facility Permit Transfer Application
- Municipal Solid Waste Transfer Activities Disclosure Statement SWF-16

By: August 1, 2002

(4) Revise the following miscellaneous OLQ permit application forms:

- Wastewater Disposal Permits (3 types)
- Land Application - Site Permit
- Land Application - Marketing & Distribution Permit
- Off-Site Storage for Biosolids and Industrial Wastes
- Agricultural Lime Substitution

- Solid Waste Minor Mod for Land Disposal
- Solid Waste Minor Mod for Processing Facilities
- Waste Tire Transporters
- Confined Feeding
- Waste Tire Processors
- Waste Tire Storage

By: January 1, 2003

(5) Revise the following miscellaneous OWQ permit application forms:

- Storm Water Construction Rule 5 NOI
- Industrial Stormwater Rule 6 NOI
- Notice of Intent Rules 7-12
- Industrial Wastewater Construction Applications
- Municipal Wastewater Construction
- Sewer Construction Application
- New Well Site Application
- 401 Water Quality Cert
- Industrial Wastewater Construction Application
- Municipal Wastewater Construction Application
- Sewer Construction Application

By: July 1, 2003

c) Address Environmental Threats in Schools and Child Care Facilities

(1) Integrated Pest Management (IPM)

- (a) Finish pilot program with child care facilities and schools with assistance from OPPTA.

By: December 31, 2001

- (b) Publish the final report of the pilot facilities.

By: June 30, 2002

- (c) Implement the models at schools and childcare facilities with assistance from OPPTA.

By: June 30, 2003

- (d) Develop an outreach plan to reach additional child care facilities on implementing IPM.

By: June 30, 2002

- (e) Implement the plan with assistance from OPPTA.

By: June 30, 2003

- (f) Evaluate the possibility of working with Indiana's experts in Turf Management and the Indiana State Chemist's Office to arrange training in schools and child care facilities on IPM Workshops on the outside of the buildings.

By: December 31, 2001

- (g) Complete 3 Turf Management and implementing IPM in the outside workshops throughout Indiana.

By: December 31, 2002

- (h) Develop a draft IPM curriculum for children pre K-2.

By: June 30, 2002

- (i) Develop a draft IPM curriculum for children grades 3-5.

By: June 30, 2003

- (j) Finalize and implement a plan to distribute the curriculum to child care facilities with assistance from OPPTA.

By: June 1, 2003

- (2) Child Care - to be jointly decided with OPPTA

- (a) Market the child care training video and the manual along with other 5 -Star tools with assistance from OPPTA.

By: June 30, 2002

- (b) Work on an environmental education curriculum for child care facilities with assistance from OPPTA.

By: June 30, 2002

- (c) Partner with Cinergy and Lilly on working with environmental justice areas in assisting the facilities to be apart of the 5-Star program with assistance from OPPTA.

By: June 30, 2003

- (3) Asthma

- (a) Develop an educational piece with the focus group for parents on the environmental triggers for asthma.

By: December 31, 2001

- (b) Investigate the possibility of a continuing outreach piece addressing some of the environmental triggers of asthma in more detail to be distributed to parents, health care professionals, and schools.

By: June 30, 2002

- (c) Develop two detailed educational pieces for the environmental triggers of asthma.

By: June 30, 2003

- (d) Finish the study of asthma and ozone that the Hoosier Environmental Council is conducting.

By: December 31, 2001

- (e) Analyze the study and develop a plan to distribute the information.

By: December 31, 2002

- (4) Tools for Schools
  - (a) Continue to partner with the U.S. Environmental Protection Agency to market asthma education and actively promote the Tools for Schools curriculum in 20 schools or school districts.  
By: December 31, 2002
  - (b) Investigate the possibility of applying the key principles of Tools for Schools in child care facilities.  
By: June 30, 2002
  - (c) Come up with a plan to train child care facilities on indoor air quality issues.  
By: December 31, 2002
  - (d) Draft a Tools for Schools curriculum for pre K-2.  
By: June 30, 2002
  - (e) Develop a Tools for Schools curriculum for children grades 3-5.  
By: June 30, 2003
- (5) Lead
  - (a) Complete summary and assessment of data collected from the 2000 Safer Families Project and focus outreach efforts on areas of the top ten items to protect your family against lead. Present results of the data to various groups.  
By: June 30, 2002
  - (b) Complete free lead risk assessment training for health departments throughout the state.  
By: September 1, 2001
  - (c) Partner with FSSA on the Windows of Opportunity project and assist where needed.  
By: December 31, 2002
- (6) Enviro-Ed-Mobile
  - (a) investigate on implementing an agency-wide road show to kids on how they impact the environment as well as how IDEM impacts the environment.  
By: June 30, 2002
  - (b) Develop a plan to implement the environmental health and education road show.  
By: December 31, 2002
  - (c) Explore the use of already existing vehicles.  
By: September 30, 2001
- d) Address Potential Environmental and Health Threats in Homes and Communities
  - (1) Healthy Homes
    - (a) Finalize, print and distribute, based on marketing plan, in conjunction with other state agencies home self-assessment for potentially harmful items found in the home.  
By: December 31, 2001
    - (b) Continue to coordinate textual and graphical development of IDEM's web-based "Enviroville."



- Grades 6-8

By: June 30, 2001

- Grades 3-5

By: December 31, 2001

- Grades K-2

By: June 30, 2002

(2) Mercury

Mercury is a priority chemical based on concern over human exposure, available data, multi-media issues and a focus to reduce the release of mercury into the environment – especially where kids are present.

Building on the existing mercury programs within IDEM, the IDEM mercury workgroup (consisting of members from each IDEM program area) will work to implement recommendations for next steps to reduce mercury emissions developed in June 2000. These recommendations will continue to be implemented through June 30, 2003. An overall multi-media mercury reduction plan identifying the various mercury “loads” will be developed by June 30, 2003.

(a) Coordinate mercury workgroup as well as agency-wide priority.

Through: June 30, 2003

(b) Review, assess and develop a plan to implement IDEM’s responsibilities in HEA 1901 (P.L. 225-2001)

By: June 30, 2002

(c) Utilizing assessment tools such as data gathering and analysis, provide valuable/key information to IDEM’s mercury water quality planning efforts as part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, fish tissue sampling data and other efforts identified below in (d).

By: December 31, 2002/June 30, 2003

(d) Research available information and identify key mercury contributors in Indiana and assemble best available mercury inventory. Each office will assume lead for air, water and land releases respectively.

By: December 31, 2002

(e) Working with other states and EPA, identify strategies to address areas of mercury exposure and future education efforts.

By: June 30, 2002 — Develop interim goal

By: June 30, 2003 — Develop final strategy

(f) Continue to limit direct exposure to mercury through education, compliance assistance activities and responding to emergencies. These include working with schools, hospitals, dental offices, heating, ventilation and air conditioning contractors/wholesalers, pharmacies and others.

Ongoing: Through June 30, 2003

(g) HVAC – Thermostat recycling program

Continue to manage the HVAC recycling program.

Ongoing

**5) Environmental Justice**

- a) Complete final draft of the full-length version of "IDEM Citizen's Guide to Public Notice Processes."

By: September 1, 2001

- b) Complete final draft a shortened version of the "IDEM Citizen's Guide to Public Notice Processes."

By: September 1, 2001

- c) Provide to the Environmental Justice Working Group a list of recommendations for possible improvements to IDEM's public notice processes.

By: September 1, 2001

- d) Complete the integration of the Citizens' Guide to IDEM Public Notice Processes into the IDEM web site and Permit Guide.

By: December 31, 2001

- e) Either tie into an EPA Glossary of environmental terms, or develop one to be placed on the Internet. This could, in fact, be part of the Permit Guide rather than the Citizens' PN Guide.

By: December 31, 2001

**6) Auto Salvage**

Four year commitment, however a substantial amount of time will be spent during the initial start-up phase (first 12 months of initiative). Grant runs from August 1, 2000 - August 1, 2004. Deliverables include a compliance assistance manual, compliance assistance workshops, inspections, enforcement actions and a final report.

- a) Coordinate and help implement auto salvage agency-wide focus.

By: June 30, 2001

- b) Coordinate workgroup to implement program.

By: June 30, 2001

- c) Successfully pass routine coordination of the auto salvage project to designated person.

By: December 31, 2001

- d) Continue to serve as agency contact for auto salvage grant and turn in quarterly reports.

Until: August 1, 2004

**7) Health and Safety**

- a) Work with Human Resources to fully implement agency-wide health and safety program.

By: June 30, 2002

- b) Work with Human Resources to track agency-wide health and safety training and medical monitoring.

By: June 30, 2003

**8) Innovations**

- a) Identify two innovation concepts under the ECOS/EPA Innovations Agreement.  
By: August 1, 2001
- b) Submit one innovation concept to EPA (likely to be CSO Watershed Management approach).  
By: September 1, 2001
- c) Submit second innovation concept to EPA.  
By: October 1, 2001
- d) Seek EPA approval and implement if approved.

#### **9) Planning and Assessment Activities**

- a) Finalize 2001-2003 EnPPA with USEPA  
By: July 1, 2001
- b) Coordinate and provide EPA with IDEM self-assessment.  
By: June 30, 2002
- c) Update 2001-2003 EnPPA and priorities.  
By: June 30, 2002
- d) Begin priority-planning process for 2003-2005 EnPPA.  
By: January 1, 2003
- e) Finalize 2003-2005 EnPPA.  
By: June 30, 2003
- f) Coordinate, with Accounting, the yearly submittals and awards for the Performance Partnership Grant.  
By: December of each year
- g) Work to develop/refine a new strategic plan for IDEM.  
By: June 30, 2003
- h) Evaluate the need for a coordinated effort for cross-office work on Reduce Toxics.  
By: June 30, 2002

#### **10) Dis-investments**

- a) Each office (including OPA) will create an inventory of specific functions.  
By: October 1, 2001
- b) Each of these office functions will be evaluated by a qualitative system developed to identify discretionary, low priority and/or under-funded activities.  
By: November 1, 2001
- c) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.  
By: December 31, 2001

- d) The above review will be repeated on the same schedule.

During: calendar year 2002

## B. OPA — Cross-Office Priorities

### 1) **Pollution Prevention Integration**

OPA will participate in the development of the integration project for implementing selected projects to enhance the use of pollution prevention in Indiana. The recommendations are complete and projects have been assigned.

- a) Provide support and technical assistance to OWQ as they develop model mercury reduction programs and policies to include in P2 minimization plans under the Great Lakes Initiative. The effort will go beyond vague guidance used by other states, and require publicly owned treatment works to put in place mercury P2 programs in exchange for effluent variance.

By: June 30, 2002 — Help finalize project.

- b) Metal Finishing Strategic Goals (2002)

- (1) Coordinate Indiana's implementation of this national "beyond compliance" program for the metal finishing industry sector in accordance with Indiana's 2001-2002 SGP Implementation Plan. Coordinate quarterly external stakeholder meetings, develop/update Indiana's implementation plan as required and periodically report on the ongoing progress of Indiana's programs, which includes the activities of six (6) ad hoc workgroups.

Through: 2002

- (2) Work with OPPTA to determine next steps and finalize 5-Star program.

By: June 30, 2001

- c) Quality Management Plan

- (1) Distribute copies of the final Quality Management Plan (QMP) to appropriate staff, as well as post the QMP on the Agency Inter/Intranets.

By: October 1, 2001

- (2) Make an Agency- wide announcement that the QMP is finalized and the process of developing procedures for implementation and assessment phase of the QMP will begin.

By: October 1, 2001

- (3) Hold Quality Assurance (QA) meetings with the QMP Team, Program and Project Managers from all Program Offices' and other QA/QC staff within the Program Offices to develop the implementation and assessment phase policies and procedures to ensure consistency of QA procedures across all IDEM programs.

September, 2001— Meetings Begin

Through: June 30, 2003 — These meetings will be held quarterly

- (4) Once the processes and procedures for the implementation and assessment phases are developed, the IDEM QA Manager will work with Program Offices to ensure consistency of QA procedures across all programs. And, also begin planning for audits and/or reviews of specific Office programs and projects. It will also be necessary to determine the order in which IDEM Offices will be audited/reviewed. The timeline and plan will be developed for implementation.

By: June 30, 2002

- (5) Maintain contact with USEPA QMP contact at least one time per quarter and maintain consistent progress.
- (6) Training opportunities for the IDEM QA Manager and other QA/QC staff will be identified and provided. The IDEM QA Manager will attend, of available, timely, and cost effective, one training per year.
- (7) Begin to track all Program/Office QAPPs and SOPs by developing a tracking database.

By: June 30, 2003

- (8) Assess and develop a tracking system for all QMP files.

By: December 31, 2002

- (9) Assess the adequacy of the Quality System at least annually, including a review of the QMP to be revised or updated as required. Also provide Quality Status Report and Work Plan to IDEM Management and EPA Region V.

By: June 30, 2002 and June 30, 2003

d) Greening The Government

- (1) Work with other state agencies and IDEM to educate on Integrated Pest Management practices.

By: June 30, 2002

- (2) Implement Integrated Pest Management practices at IDEM.

By: June 30, 2003

- (3) Work with other state agencies and IDEM to educate on mercury and lead issues.

By: June 30, 2002

- (4) Implement recycling of mercury devices at IDEM.

By: June 30, 2003

e) Agency-wide Environmental Education Coordination

- (1) Continue to coordinate IDEM school presentation resources and materials with program areas to include Earth Week presentation kits and IDEM exploration book throughout the year.

- (2) Coordinate the implementation of the pilot Clean Sweeps Program.

By: October 1, 2001

- (3) Continue to assist in coordination of various outreach events like Earth Day Indiana, HASTI, IYES, State Fair, and IRC education sessions.
  - (4) Develop short and long-term education plan for IDEM outlining steps for implementation.  
By: December 31, 2001
  - (5) Implement short and long-term education plan.  
By: June 30, 2002
  - (6) Develop K-2 multi-media curriculum.  
By: June 30, 2003
  - (7) Continue to support other outreach and education- related activities like grant reviews, community and school presentations and various conferences.
- f) Compliance/Enforcement Team
- (1) OPA staff continues to provide staff to Compliance/Enforcement Team.
  - (2) Enforcement Referral Policy. This project has been broken up into five different projects, with OE taking the lead on each. Continue to assist and help finalize this policy.  
By: December 31, 2001
  - (3) Develop a Current Operating Procedure (COP) which encompasses the process to be used for strategic agency-wide compliance/enforcement planning, including recommendations for compliance and enforcement priorities.  
By: August 1, 2001— Final COP/recommendations to be completed.
  - (4) Inspection Protocol Policy  
(C/E Team carry/over from 2000-2001)  
Conduct research and draft inspection protocol policy. The purpose of the policy is to help ensure consistent inspection protocols by all agency programs.  
By: July 1, 2002 — Final policy due.
  - (5) Continue use, expansion and tracking of multimedia screening evaluations (additional questions on checklist, cross-media inspector training, and final facility compliance status).
  - (6) Assist in special MM compliance/enforcement activities as needed, including conducting research on other state initiatives and innovations as part of the C/E planning process or special business need.
  - (7) Serve as planning arm and coordinator to pursue a sector approach with three of Indiana's most significant industrial sectors, namely steel mills (including mini-mills and electric arc furnaces), foundries and auto salvage facilities.
- g) Pollution Complaint Clearinghouse/ Rapid Enforcement Response
- (1) Update the existing PCC COP to include changes/adjustments made since the initial COP was drafted.  
By: October 1, 2001

- (2) Year-end Complaint Comparison  
Summarize, compare and identify trends as they relate to complaints received and handled by IDEM for 1999, 2000, and 2001.  
By: March 1, 2002 — Prepare for complaint review.
- (3) PCC Quarterly Complaint Summaries  
Generate quarterly complaint summaries and revise content as appropriate 3 weeks after all data is received each quarter.
- (4) PCC Website Enhancement  
Provide information to the public concerning IDEM's complaint handling process. This will consist of adding 1-2 pages of text to the existing PCC website.  
By: September 1, 2001
- (5) PCC Complaint Handling  
Update and maintain internal complaint handling procedures. Distribute to IDEM, "1-800 #" phone reception staff, administrative staff and complaint coordinator staff. This will ensure that all incoming pollution complaints are routed to the appropriate staff. These procedures will be updated on an as-needed basis
- (6) Maintain Quattro-Pro based system in order to store, summarize and analyze cross program agency complaint information on a monthly and annual basis.
- (7) Transition the Rapid Enforcement Response Program to the Office of Enforcement.  
By: December 31, 2001
- h) Serving as an entry point/single-point-of-contact for specific permitting projects or permit-related questions and coordinate Environmental Impact Statements (EIS).
- i) Ongoing responsibility to serve as a point-of-contact for both internal and external requests for cross media permit-related information.
- j) Facility Linkage Application Process
  - (1) Complete resolution of original Phase 1 FLA Master Record set.  
By: December 1, 2002
  - (2) Identify Phase 2 resolutions and develop strategy for completion.  
By: December 1, 2001
  - (3) Establish process to dynamically link constituent databases and the CORE Data Model to the EPA FLA Reconciliation Process.  
By: July 1, 2002
  - (4) Establish and distribute naming standards for facility names and location addresses (must coordinate with Core Team and Enterprise Data committee).  
By: December 1, 2001
  - (5) Develop plan for Agency-Wide participation in and maintenance of linked state and federal facility data in constituent databases in FLA and Core Data Model.  
By: March 1, 2002



- (6) Continue resolution process of the Manual Linkages generated by FLA for state of Indiana program facilities records (maintain pending count of zero).  
Ongoing
- (7) Continue to provide facility information datasets on request, internally and externally.  
Ongoing
- (8) Continue to provide outreach demonstrations and training for FLA and Envirofacts on request.  
Ongoing

## **C. OPA — Office Priorities**

### **1) Compliance/Enforcement Assistance (on-going)**

- a) Participate as a member of the Midwest Environmental Enforcement Association's Training Committee.

By:

- b) Coordinate multimedia agency response for problem facilities (via either complaint research or coordination of a multimedia compliant investigation).

By:

- c) Conduct national compliance/enforcement trends analysis and research. These activities will be conducted throughout the year, culminating in a Planning Report. This Report will be conveyed to the C/E Team for planning purposes.

By:

- d) Research non-jurisdictional complaints; make referrals to IDEM program areas and/or local/state/federal agencies.

By:

### **2) Compliance/Enforcement (C/E) Team support**

(administrative support and special projects)

Develop bi-weekly meeting agendas and summaries, prepare periodic reports and complete other projects as assigned.

### **3) Permit Report Card**

- a) Produce IDEM Monthly Status Report on Environmental Permits data and maintain/update the ESQC website.

Ongoing: Monthly

- b) Monthly updating and posting on the report on the Internet, and to staff, as well as maintaining "Report Card" posters near the Commissioner's office. In November 2000, a special set of report cards was created to commemorate two years of no late permits by IDEM. During that period, the agency issued 5,857 permits without any late permits (permits issued after the statutory deadline).

### **4) Website Updates and Maintenance**

- a) Publish 2001-2003 EnPPA online.

By: September 30, 2001

- b) Redesign the OPA website, adding pages for each OPA program and project.

By: November 30, 2001

- c) Publish IDEM Quality Management Plan online.

By: November 30, 2001

- d) Redesign the IDEM Children's Environmental Health Initiatives website.

By: September 30, 2001

- e) Publish the "Citizen's Guide to Public Participation Processes Associated with IDEM-Regulated Activities" online.

By: December 1, 2001

- f) Continue to update and maintain the following agency websites:
- IDEM OPA (Office of Planning and Assessment) office website
  - Metal Finishing Strategic Goals Program
  - Children's Health and Environmental Initiatives
  - IDEM permit application HTML help-files
  - IDEM Permit Guide
  - EQSC (Environmental Quality Service Council) Report website & associated monthly reports
  - EnPPA online
  - IDEM's "Parents/Teachers" and "Kids/Students" link pages
  - IDEM Environmental Justice program website & draft Citizen's Guide pages
  - IDEM Agency Priorities online (an extension of the Office of Planning & Assessment website)
  - Mercury

- g) New IDEM Permit Guide (<http://www.IN.gov/idem/guides/permit>) pages

- (1) New pages needed, including but not limited to:

- (a) Permit name/ownership changes, a "how to" reference guide to transferring permits (not all permits are transferable).

By: December 31, 2001

- (b) Municipal wastewater discharge permits (addressing both major {EPA form 2A} and minor permits).

By: December 31, 2002

- (c) SW permit modifications

By: June 30, 2002

- (d) Transfer station permit

By: June 30, 2002

- (2) Develop the following features and cross-linking them with the Permit Guide

- (a) Add tables which summarize the costs, requirements, and public notice process for the air and water, and some of the waste disposal permit process.

By: December 31, 2002

- (b) Integrate the "IDEM Citizens' Guide to Public Notice Processes" into the Permit Guide.

By: December 31, 2001

- (c) Develop a "Spill Table" (like the one on the Michigan website brought to our attention by Marc Hancock).

By: June 30, 2003

**5) Compliance Checks for Department of Commerce**

Coordinate responses from Enforcement and Compliance. This is a priority on an “as per request” basis.

**6) Database/public access grant- Drinking Water**

Coordinate project and quarterly reports with drinking water.

**7) Compliance/Enforcement Planning (OPA activities referenced in the COP)**

Conduct national compliance/enforcement trends analysis and research. These activities will be conducted throughout the year, culminating in a Planning Report. This Report will be conveyed to the C/E Team by an as-yet-to-be-determined date (this date will be contained in the C/E Planning COP referenced above).

**8) Multi-Media Screening Evaluations**

Provide monthly progress reports, update current operating procedures, MM screening checklist and staff training program as necessary to ensure agency utilization of MM screening evaluations remains an effective compliance tool.

**9) Coordinate Multimedia Permits**

- a) Continue to update the IDEM Permit Guide as needed.
- b) Prepare monthly IDEM Permit Status reports for the Environmental Quality Service Council and the public.
- c) Serve as agency contact for multimedia permit assistance and information.

**10) OPA Planning/Assessment Activities**

- a) Continue to lead agency-wide planning activities.
- b) Conduct office self-assessment.

By: June 30, 2001  
Quarterly updates completed by the 25th of the month following the quarter

- c) Develop OPA vision/plan/mission.

By: June 30, 2002

- d) Continue as IDEM contact with ECOS/EPA and provide timely information to the other members of senior staff.

- e) Re-evaluate structure of OPA and develop a plan.

By: June 30, 2002

- f) Hire SEM1 and ES3 to complete OPA staff.

By: July 30, 2001

- g) Serve on several groups to include liaison with ISDH, FSSA, IDOA (Greening), Indiana Child Care Fund and Bi-National Toxics Strategy Workgroup.

## 18. OFFICE OF POLLUTION PREVENTION AND TECHNICAL ASSISTANCE

Jim Mahern  
 Assistant Commissioner  
 Office of Pollution Prevention and Technical Assistance  
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It is the goal of the Office of Pollution Prevention and Technical Assistance to develop and foster with in the Indiana Department of Environmental Management's environmental protection efforts an emphasis on environmentally and economically sound approaches to achieve environmental results. This includes proactively providing resources for source reduction, re-use and recycling, voluntary compliance and pollution prevention. OPPTA encourages environmental results through various grant opportunities, public recognition awards such as the various "Governor's Awards for Excellence," broad-based educational programs and technical assistance.

### A. OPPTA — Agency-Wide Priorities

#### 1) *Building a better IDEM - Dis-investments*

- a) Create an inventory of specific functions.

By: October 1, 2001

- b) Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or under funded activities.

By: November 1, 2001

- c) Repeat the above review in calendar year 2002.

By: December 31, 2002

#### 2) *Reducing Exposure to Toxics*

- a) Develop a Risk Toolbox

Lead the compilation of information about approaches used by IDEM to factor risk into environmental decisions and catalogue resource tools.

Bring together a workgroup consisting of staff from various programs areas to develop a locator list of databases with descriptions and contact persons and a list of standards or exposure limits for toxic substances.

By: July 1, 2001

- b) Establish an agency workgroup to develop a "glossary" of risk-related terms with definitions and discussion of how applied in the agency. An initial list of terms will be generated from the IDEM Risk Integrated System of Closures manual, and Indiana code and administrative code.

By: July 1, 2001

#### 3) *Compliance and Enforcement Team Priorities:*

Develop P2, assistance and compliance/enforcement strategy for major TRI increases; prioritize TRI reported substances for future regulatory and non-regulatory consideration.

- a) Strategically identify the Top 20 to 50 TRI reporters having the most significant impact on State TRI air and water release totals:
  - (1) Identify the top 100 TRI release reporters in RY1999 and from there remove:
    - Facilities with percentage decreases in reported amounts from 1995 to 1999 that are consistent with the goals of the Governor's Challenge. We will send those facilities in this group that are not currently Governor's Challenge participant, a letter/packet inviting them to join.
    - Facilities that are impacted by a significant regulatory driver within the next year (i.e., June 2002).
  - (2) Identify and separate out facilities that are included in the new reporting sectors starting in 1998.
- b) Utilize TRI release data to identify the Top Six most significant chemicals reported to TRI that impact progress on achieving goals of the Governor's Toxic Reduction Challenge. Identify facilities that associated with the releases of the top six chemicals. If these facilities are not including on the other Top lists, OPPTA will send them letters to make them aware of our concern and also invite them to join Gov.'s Challenge if they have not already joined.
- c) Creatively address the new and remaining sectors through three (3) mechanisms:
  - (1) Voluntary outreach: for facilities with percentage decreases in TRI reported amounts from 1995 to 1999 that are consistent with the goals of the Governor's Challenge, we will send those facilities that are not currently Governor's Challenge participant, a letter/packet inviting them to join.
  - (2) Provide follow up to outreach implemented in section above. For each outreach effort, staff shall decide which form of follow-up is most appropriate (i.e. letter, phone call, or site visit). Follow-ups shall begin within 2 weeks of original letter going out. Results shall be entered into the CTAP database within 10 working days after completing assistance effort to each facility.
  - (3) Recommend regulatory development for sectors with large impact on TRI if other mechanism fails.
- d) OPPTA will make TRI reporters' data available to all agency programs. Provide agency staff with 1999, 2000 and 2001 (when available) TRI data.

By: June 30 of each year (i.e., 2001, 2002, and 2003 respectively)

#### **4) Communicating Environmental Information**

- a) Participate in the Core Data Integration Team.
  - (1) Attend CORE team meetings.

Quarterly — at a minimum
  - (2) Review and comment on documentation guiding and supporting the Agency Data Integration priority.

Ongoing
  - (3) Review and comment on project proposals for offices moving databases into Oracle and Cool-Gen (development software for windows interface)

Ongoing

- b) Participate in Agency GIS (Geographic Information Systems) Workgroup. Meet at least quarterly. Serving in an advisory capacity, review and comment on policies and procedures fostering the following goals:
- Integration Goal: To advance and integrate GIS into the Information Management Systems of the State Agencies.
  - Training Goal: To foster a broad base of trained GIS users in the State Agencies.
  - Data Goal: To create and maintain high-quality GIS data through the normal business practices of the State Agencies
  - Communication Goal: To create and maintain cooperative and collaborative relationships between the State Agencies and with the GIS community at large through effective communication.

## B. OPPTA — Branch Specific Priorities

### 1) *Pollution Prevention Branch*

The Pollution Prevention branch provides an active outreach program, which promotes pollution prevention to Indiana industry and within the Indiana Department of Environmental Management. Our promotion of pollution prevention includes the annual Governors' Awards for Excellence in Pollution Prevention; the Indiana Partners for Pollution Prevention; and the integration of pollution prevention into regulatory programs within IDEM. The branch also manages the state's Toxic Release Inventory program.

- a) Provide assistance to businesses that seek information on pollution prevention opportunities for their manufacturing or commercial facilities by providing technical information (IC-13-27-2-5).
- (1) Provide quality assistance regarding Pollution Prevention to at least 200 callers who are referred to the OPPTA phone assistance.
  - (2) Provide pollution prevention assistance to our customers upon request.
    - (a) Develop and implement a process to ensure OPPTA staff will follow up on referrals made to the OPPTA for pollution prevention technical assistance by July 15, 2001.
      - Develop referral management process.

By: June 30, 2001

      - Developed and implement reporting and tracking mechanism.

By: July 1, 2001

      - P2 staff will offer assistance to least 150 referrals.
    - (b) Coordinate multimedia referral process with Agency Compliance Enforcement team:
      - Assign referrals to OPPTA staff using the CTAP database.
      - Complete the P2 assistance referrals by the 4th of each month consistent with multimedia cop.
      - Provide monthly referral reports to the Compliance Enforcement team coordinator.
      - Follow-up on recommendations and adjust process as needed.

- b) Continue to administer pollution prevention grants and pilot projects in cooperation with the Indiana Clean Manufacturing Technology and Safe Materials Institute (CMTI) (IC-13-27-2-11).
  - (1) Provide active contract management, in coordination with OAQ, for the Small Business Technical Assistance contract between OAQ and CMTI.
    - (a) Monitor quarterly progress reports and evaluate progress toward achieving objectives of grant agreement.
    - (b) Provide Office of Air Quality with progress updates.
 

Quarterly
  - (2) Provide effective management of the P2 Advocate grant project with CMTI.
    - (a) Monitor quarterly progress reports and evaluate progress toward achieving objectives of grant agreement.
    - (b) Provide feedback to CMTI on progress toward meeting grant objectives.
 

Quarterly
  - (c) The achievement of the numerical goals for technical assistance contacts will be the chief metric used by the project administrator. Success will be defined by:
    - 100% completion of scheduled workshops;
    - 100% completion of development of sector specific brochures;
    - 10% to 25% of total potential service population participating in workshops and/or receiving on-site technical assistance.
  - (d) Success will be measured by the appropriateness of the clean manufacturing technical assistance rendered to enable small businesses to:
    - Determine the applicability of various NESHAPs to their operation;
    - Secure an air permit, if needed;
    - Prepare and submit complete and timely emission reports;
    - Avoid regulation, including permits, by modifying production processes, substituting materials, etc., to achieve below-threshold emission; and
    - Reduce costs of production.
    - Increase in compliance rates for facilities found to be out of compliance with various air related regulations.
  - (3) Provide Assistant Commissioner with quarterly progress report.
- c) Prepare report on the state's progress on promoting pollution prevention that will be published on the Internet (IC-13-27-6-1).
  - (1) Draft Annual assessment of accomplishments for FY will be made available for AC review.
 

By: November 30, 2001
  - (2) Annual assessment of accomplishments for FY 1999-2001 published on the web.
 

By: December 31, 2001
  - (3) Annual assessment of accomplishments for FY 2001 to 2003 published on the web.
 

By: December 31, 2003



- (4) Research and Develop a database for P2 successes projects and look into the Clean Manufacturing Technology and Safe Materials Institute (CMTI) as a mechanism for providing this database.
  - (a) Research the database
    - By: June 31, 2002
  - (b) Develop the database
    - By: March 29, 2003
- d) Identify obstacles to pollution prevention and provide opportunities to promote and assist in pollution prevention. (Grant Commitment terminates 9/30/01)
  - (1) Continue working with designated program area teams to implement selected pollution prevention integration projects.
    - By: June 30, 2001
  - (a) Develop and implement a tracking mechanism to monitor the progress made by program areas on the implementation of selected pollution prevention integration projects.
    - By: June 30, 2001
  - (b) Participate in meetings with Office of Air Quality, Office of Land Quality and Office of Water Quality to facilitate and work toward completion of shared priorities.
  - (c) Respond to requests from the Office of Enforcement for technical assistance on the determination of pollution prevention Supplemental Environmental Projects with in seven working days.
- e) Continue to mount active outreach and educational programs to further the development and adoption of the principles and techniques of pollution prevention. (IC-13-27-2-5)
  - (1) Develop and implement a pollution prevention training program for OPPTA field staff.
    - (a) Development of the training program to be completed.
      - By: July 31, 2001
    - (b) Begin staff training.
      - By: September 1, 2001
    - (c) Train all OPPTA field staff responsible for performing on-site technical assistance.
      - By: December 31, 2001
    - (d) Develop and implement a policy and process to have all field staff new hires trained within sixty (60) days of beginning employment in OPPTA.
      - By: December 31, 2001
  - (2) Provide Pollution Prevention program overview training to regional office staff.
    - By: December 31, 2001
  - (3) Evaluate the annual Governor's Awards for Excellence in Pollution Prevention. Awards will be presented annually.
    - By: September 30, 2002 and September 30, 2003
  - (a) Promote the program statewide:

- Promote on the Internet

By: March 15, 2002 and March 15, 2003

- Press release

By: March 30, 2002 and March 30, 2003

- Postcards to TRI reporters, small and large quantity generators

By: April 15, 2002 and April 15, 2003

- Ads in publications such as Chambers GreeNotes and Indiana Association Cities and Towns newsletter.

By: April 30, 2002 and April 30, 2003

- (b) Evaluate nominations for technical consistency with the State definition of Pollution Prevention.
- (c) Perform site visits and compliance checks for selected finalists.
- (4) Continue coordination of the Indiana Pollution Prevention Partners that includes:
  - (a) Maintaining active participation in quarterly meetings of the Partners for P2 and the Department of Defense P2 Partnership.
  - (b) Continue to provide assistance to the Partners for P2 for the development of and successful completion of the annual Pollution Prevention conference.
- f) Continue to promote increased coordination between the divisions of the department and between the department and other governmental regulatory programs with responsibilities and duties relating to toxic materials and environmental wastes. (IC-13-27-2-5)
  - (1) Analyze data submitted to the Toxic Release Inventory for appropriateness as measures of pollution prevention progress.  
The P2 branch will perform an analysis of Source Reduction Activity (SRA) Code reporting to TRI.  
By: December 31, 2001
  - (2) Quality assure and effectively communicate Toxic Release Inventory (TRI) data.
  - (3) Establish a process to quality assure, establish a baseline and communicate data on persistent, bioaccumulative toxic substance reported to TRI.  
By: July 1, 2001
  - (4) Release data through a formal IDEM press release, in "Indiana's Annual State of the Environment Report" and the IDEM TRI web site on the Internet
    - (a) RY 2000 TRI data  
By: April 30, 2002
    - (b) RY 2001 data  
By: April 30, 2003
  - (5) Manage the contract between IDEM Information Technology and OPPTA for the development and conversion of existing TRI database into an Oracle platform system.
    - (a) Scope of work for conversion completed.
    - (b) Project proposal to be presented to Core Data Integration Team

Between: August 9, 2001 and September 23, 2001

- (c) Beta test of TRI product
  - By: April 1, 2002
- (d) Implementation phase or full scale testing
  - Beginning: May 2002
- (e) Production rollout
  - By: June 1, 2002
- (f) Begin to use the newly developed TRI database system for data entry and quality assurance of the RY 2001 data to be received.
  - By: July 1, 2002
- (g) Final review phase completed
  - By: August 1, 2002
- (6) Evaluate effectiveness of Indiana searchable TRI website and determine whether or not to keep it.
  - By: June 30, 2003
- (7) Provide TRI data upon request to internal and external customers with in 30 days of request.
- g) Outreach and Education
 

Continue to develop and distribute educational outreach materials through public outreach and training sessions regarding environmental requirements, compliance methods, voluntary environmental audits, and pollution prevention technologies. (IC 13-28-3-2).

  - (1) External communication of Toxic Release Inventory (TRI) reporting information.
    - (a) Provide three (3) educational TRI workshops, two in south region and one in north region of the state.
      - By: June 30, 2001 (for report year 2000)
    - (b) Provide three (3) educational TRI workshops in Indianapolis.
      - By: June 30, 2002 (for report year 2001, depending on budget)
  - (2) Continue implementation of Governor's Toxic Reduction Challenge:
    - (a) Using 1999 TRI data assess the progress in toxic use reduction by current participants.
      - By: December 31, 2001
    - (b) Using 2000 TRI data assess the progress in toxic use reduction by current participants.
      - By: December 31, 2002

## 2) Source Reduction and Recycling Branch

The Source Reduction and Recycling Branch is charged by statute to provide financial and technical assistance to local communities to provide education and promotion of recycling collection, the use of recycled materials, solid waste source reduction, management of yard waste, and household hazardous waste collection. It is our goal to assist local governments in achieving the statutory goal of 50% waste reduction through outreach efforts that consist of providing grants to cities, towns, counties,

schools, non-profits, and local solid waste management districts. We also provide public education and technical assistance through site visits, recognition programs, assistance brochures, fact sheets and training workshops.

- a) Administer Solid Waste Management Fund Grant Program  
Provide education and promote recycling, the use of recycled materials, waste reduction, and the management of yard waste. (IC 13-20-22-2 & IC 13-19-1)
  - (1) Solicit and receive approximately 100 grant applications, review, and award approximately \$2.0 million each fiscal year. Grant rounds are scheduled for 5/31/01, 9/30/01, 1/31/02, 5/31/02, 9/30/02.
    - (a) Provide project development assistance to 100 potential applicants for meeting source reduction and recycling grant application requirements each fiscal year.
    - (b) Revise the grant non-rule policies ("1339" & "349") and prepare for public notice  
By: December 31, 2001
    - (c) Revise application checklist and draft standard policies to better guide applicants  
By: August 30, 2001
    - (d) Publish the final approved version on the Internet  
By: October 31, 2001
  - (2) Prepare annual source reduction and recycling grant program report.
    - (a) Prepare an annual report for web publication Annual report is to be based on state fiscal year.  
Annual: October 31st of each year.
    - (b) Prepare and submit ten-year program report for public release.  
By: October 31, 2001
    - (c) Provide additional reports as needed for legislative study committee (HCR 58).
  - (3) Organize and host quarterly "Grants Focus Group" meetings, to invite grant customer feedback and recommendations regarding the Indiana Recycling Grants program and the Indiana Household Hazardous Waste Grants program.
    - (a) Develop mechanism to measure diversion of each funded project.
    - (b) Standardize final reports.
    - (c) Provide monthly review of 10% of open grant files.
    - (d) Develop a current operating procedure for grant file management and review.
- b) Administer Household Hazardous Waste Grant Program. (IC 13-20-20)  
Provide assistance to local communities regarding household hazardous waste.
  - (1) Solicit and receive 5 grant applications, review, and award approximately \$380,000 each fiscal year. Grant round submittal dates scheduled for 6/30/01 & 6/30/02.
    - (a) Provide grant development assistance to 10 potential applicants annually for meeting household hazardous waste grant application requirements.  
By: June 30, 2001 and June 30, 2002
    - (b) Revise application checklist and draft standard policies to better guide applicants.  
By: August 30, 2001
    - (c) Publish on web the final approved version.  
By: October 31, 2001

- (2) Prepare annual household hazardous waste grant program report. (IC 13-20-22-2)  
Prepare and submit draft annual report and publish the final approved version on the Internet. The annual report is to be based on state fiscal year.  
Annual: October 31st of each year
- (3) Organize and host quarterly "Grants Focus Group" meetings, to invite grant customer feedback and recommendations regarding the Indiana Recycling Grants program and the Indiana Household Hazardous Waste Grants program.
  - (a) Develop mechanism to measure diversion of each funded project.
  - (b) Standardize final reports.
  - (c) Provide monthly review of 10% of open grant files.
  - (d) Develop a current operating procedure for grant file management and review.
- c) Educate students, teachers, consumers, and businesses about the benefits of solid waste minimization, hazardous waste minimization, and recycling, composting and source reduction through presentations, publications, guidance documents and technical assistance programs. (IC 13-14-1-6, IC 13-14-1-10 & IC 13-14-1-14)
  - (1) Provide all Indiana residents with the nearest recycling location.
    - (a) Redesign into Oracle platform the recycling collection sites interactive database.  
By: October 31, 2001
    - (b) Upgrade information on the recycling collection sites interactive database and publish on the IDEM Web page.  
By: December 31, 2001
    - (c) Maintain and update this information.  
Quarterly
  - (2) Provide technical assistance to 15 communities on pay-as-you-throw programming.
    - (a) Manage contractor regarding Pay-as-you throw programs.  
Through: September 30, 2001
    - (b) Develop and publish on Web site all known Indiana pay-as-you-throw community programs.  
By: December 31, 2001
    - (c) Prepare and publish on Web a final report on effectiveness and usage of pay-as-you-throw programs in the state.  
By: December 31, 2001
  - (3) Encourage recycling statewide via recognition award.
    - (a) Coordinate with Operations Branch and assist in promotion of the Governor's Awards for Excellence in Recycling.
    - (b) Encourage and assist staff to seek at least 50 nominations each year.
    - (c) Perform site visits and compliance checks for each selected finalist.
    - (d) Evaluate and recommend finalists through a complete examination of nominated programs.

- (4) Provide educational opportunities to our external customers on technical assistance, upon request.
  - (a) Provide staff attendance or booth displays at the following conferences, and workshops: State Fair, Black Expo, Earth Day, Governors Conference on the Environment, Indiana Association of Cities and Towns annual conference and the Indiana Recycling Coalition annual conference.
  - (b) Provide technical assistance onsite visits each year to at least 450 communities or interested parties, such as: solid waste management districts, counties, cities, towns, schools, non-profits, environmental groups, recycling companies, waste-haulers.
  - (c) Provide resources, staff and support for IDEM's participation in the annual America Recycles Day events. Serve as IDEM's lead on ARD events.
  - (d) Serve as IDEM's recycling representative on various committees, including the Greening the Government program to assist in recycling efforts around the state.
  - (e) Research and redesign state's Material Exchange publication and service to better meet the needs of the customer base.
    - Add agricultural/nitrogen category.
    - Provide recommendations on how to better meet the needs of the customer base

By: December 31, 2001

- Implement approved changes

By: June 30, 2002

- (f) Organize and coordinate a HHW/CESQG training program or workshop with field partners (i.e. HHW task force, AISWMD, IACT, etc.).

By: June 30, 2002

- (g) Organize and coordinate an open dumping and illegal burning workshop for public officials with field partners (i.e. SIRI, NIRI, AISWMD, IACT, etc.).

By: June 30, 2003

- (h) Organize and coordinate with local solid waste management districts an education and technical assistance workshop with Goodwill Industries regarding household generated hazardous material collection and handling.

By: June 30, 2003

- (i) Provide technical and financial assistance to a Southwestern Indiana Glass Reuse Pilot Project, coordinated through the IDEM Southwest Regional Office with additional support from the Indiana Department of Transportation.

- Start-up of pilot project

By: June 30, 2002

- Progress report on project

By: June 30, 2003

- (j) Provide technical and financial assistance to a Southeastern Indiana State Park Composting Pilot Project, coordinated through the IDEM Southwest Regional Office with additional support from the Department of Natural Resources.

- Start-up of pilot project

By: June 30, 2002

■ Progress report on project

By: June 30, 2003

- d) Evaluate State's progress on meeting state's recycling goals (50% diversion) by 2001.
  - (1) Perform State wide recycling measurement survey
    - (a) Provide study results, evaluation, and recommendations regarding the measuring of source reduction and recycling progress. Produce final report.

By: December 31, 2001

- (b) Meet with Office of Air Quality, Office of Land Quality, and Office of Water Quality at least quarterly to evaluate and give input on cross-agency priority work.
- e) Investigate and develop tire recycling program (IC 13-20-13-8)
  - (1) Establish working group to investigate tire recycling options.
    - (a) Organize and coordinate short-term task force with interested field partners to investigate recycling options for illegally dumped tires.
    - (b) Provide final recommendations report.

By: December 31, 2001

- (2) Develop financial and technical assistance tools to promote tire recycling.
    - (a) Explore financial assistance options with Office of Land Quality to promote tire recycling.
    - (b) Based on approved recommendations, develop tire recycling grant program guidelines, application forms, and policies.

By: June 30, 2002

- (c) Develop marketing brochure and web site material to promote tire recycling grant program.

By: June 30, 2002

- (d) Implement tire recycling grants program.

By: July 1, 2002

- (e) Complete at least one advertised grant round.

By: June 30, 2003

### 3) **Operations Branch**

The Operations Branch assists all staff within OPPTA to complete projects and special assignments. The Branch is responsible for tracking accounts, assisting with Boards and committees, database development and tracking, and a myriad of support functions.

- a) Toxic Release Inventory File Room:

- (1) Prepare all TRI reports prior to 1995 for microfilming by the Commission on Public Records. This project will continue for FY 2002 and 2003. The goal is to complete a minimum of 12.5% of records per quarter.

Beginning: July, 2001

- (2) Utilize a multi-document scanner to electronically records all new TRI submission beginning with the reports received in 2001.
  - (3) Acquire and utilize a reader/printer to reproduce microfilmed records.
  - (4) Work with the P2 Branch to encourage all TRI reporters to submit their annual reports in electronic format. Each year focus on reaching those whom file on paper at least 3 months prior to the annual deadline.
- b) Mailing List Consolidation:  
Continue to centralize the various mailing lists used by OPPTA for one-stop updates to all the lists. Coordinate with the MACS lists and update as new addresses changes or requests arrive.
- c) Utilize PC's to Send Multiple Faxes:
  - (1) Assure that all Operations staff PC's are loaded with fax software.
  - (2) Train all Operations staff to utilize PC's to send faxes for OPPTA staff.  
By: December 1, 2001
  - (3) Designated staff in Operations will be charged with preparing group lists for faxes, such as SWMD, Partners and other groups we frequently contact.  
By: December 1, 2001
- d) Develop Performance Track Process (in cooperation with USEPA):
  - (1) Operations will work with the OVC Branch Chief to continue the environmental stewardship performance track process for Indiana applications.
  - (2) Procedures will be incorporated into COP's.  
By: January 1, 2002
  - (3) First draft completed.  
By: September 30, 2001
  - (4) Ensure that any US EPA final reports are prepared in a timely manner and deadlines set by US EPA are met.
- e) Meeting Lists and Arrangements:
  - (1) Operations Staff will develop a list of facilities available for various sized meetings.  
By: October 30, 2001
  - (2) The Operations Branch Chief will coordinate with the OPPTA Branch Chiefs to encourage the use of Operations staff for meeting arrangements.  
Beginning: November, 2001
  - (3) Create a checklist for routine staff meetings and for each routine outreach function.
    - (a) State Fair checklist by July 15, 2001 and other event checklists should be ready at least 60 days prior to the event. Each checklist should be reviewed immediately after an event and recommended changes made. Each checklist should be updated 6 months prior to subsequent routine events. An example is the State Fair checklist should be ready for the 2002 fair by March 1, 2002.



- (4) Operations will ensure all OPPTA public meetings are listed on the Web, with agendas, at least two weeks before meetings.
- f) Presentation Training:

If there is sufficient need by other Branches within OPPTA, Operations will train secretarial and administrative assistant staff in the use of PowerPoint to develop presentations. Training will be approved using the State training center and staff will be required to complete beginning level training and may be required to complete an intermediate or advanced offering.

  - (1) Beginning training approved  
After: July 1, 2001
  - (2) Beginning training completed  
By: February 1, 2002
- g) Recognition through Awards
  - (1) Coordinate, organize and implement annual awards ceremony for Recycling, P2, or a combined Environmental Award. All tasks will be completed according to an event calendar developed in cooperation with the Awards Program Director, appropriate program Branch Chief, the Assistant Commissioner, and the Operations Branch Chief. This schedule will be created using the COP under development.  
By: September 1, 2001
  - (2) Award winners will be listed on the IDEM web page within 2 workdays of the date of presentation.
  - (3) In conjunction with the appropriate branch the Program Director will promote and encourage nominations for each award program. Campaign timing will be a part of the schedule developed in g)(1) above.
  - (4) Propose a draft plan to streamline and coordinate the Governors' Awards.  
By: October 1, 2001
  - (5) If the proposal to streamline and coordinate the Governors' Awards is accepted, create final plan within one month after acceptance.
- h) Provide Quality Assistance to all callers contacting IDEM main phone lines.
  - (1) Train receptionists in the Executive area about the use of the Agency Director with emphasis on appropriate Branches or personnel in OPPTA whenever new staff is hired or when misdirected calls increase.
  - (2) Hold quarterly training, information sessions with the front desk personnel in the Executive department for OPPTA function and duty updates.
- i) Maintain a regulatory resource library for compliance and technical assistance staff:
  - (1) Gather all IDEM non-rule policy documents.  
By: January 1, 2002
  - (2) Gather all final rules published in the Indiana Register that are not covered in the most recent statute books.  
By: January 1, 2002

- (3) Final rules and non-rule policy documents or their electronic addresses are located on the I drive under Regulatory clearinghouse and is updated monthly.
- (4) An annual list of all-new final rules and NRPDS will be provided through DMS within 1 month of the close of the Fiscal Year.
- (5) Provide all OPPTA staff with any updated Web site that offers the above information if developed, within 1 month of it's development.
- (6) Distribute any updated final rules to OVC staff for review as they are received.
- (7) Update the "Environmental Compliance in Indiana" monthly. Inform the staff of this updates availability via e-mail whenever updates occur.
- j) Confidentiality Training
  - (1) Provide confidentiality training within 21 days of start date for OPPTA's staff person.
  - (2) Provide confidentiality training within 30 days of start date for any covered person working outside the OPPTA office.
  - (3) Work with OVC staff to update the confidentiality procedures as needed.
- k) Continue to provide clerical support to the CMTB meetings. This occurs quarterly. Staff will provide note taking and minutes preparation and meeting room arrangements if needed.
- l) Create and maintain the Document Management System (DMS) library policies and procedures for OPPTA.
  - (1) Provide librarians for all but contracts/grants library.
  - (2) Develop and maintain COP's for utilization of the DMS. Development will be completed.

By: July 31, 2001
- m) Maintain a centralized tracking system for expenditures and report expenditures to the Assistant Commissioner monthly during One on One meetings.
- n) Create COP list for use by all OPPTA staff
  - (1) Compile all current COP's utilized by OPPTA into a DMS.

By: December 31, 2001
  - (2) Maintain the COP data library once established.
  - (3) Develop a system for assessing the need for a COP and review process for proposed COP's prior to entry into the DMS as final.

By: January 1, 2002
  - (4) Update COP's within 4 weeks of a change to the COP.

#### **4) Compliance Assistance Branch**

The Office of Voluntary Compliance is the Indiana small business assistance program. We assist regulated entities in achieving compliance and promoting cooperation between the Indiana Department of Environmental Management and regulated entities. Outreach efforts consist of providing assistance to inquiries; developing compliance manuals, developing recognition programs, assistance brochures, fact sheets and conducting educational workshops. To effectively provide the type of assistance that may be required by the regulated community, the Office of Voluntary Compliance employees maintain a strict confidentiality policy.

- a) Compliance Assistance  
Continue Office of Voluntary Compliance (OVC)/Compliance and Technical Assistance Program (CTAP) to assist regulated entities in achieving regulatory compliance and promote cooperation between the department and regulated entities. (IC 13-28-1-2).
  - (1) Provide high quality compliance assistance to all callers who are referred to the OPPTA phone assistance team to increase the number of true confidential assistance calls.
    - (a) Redistribute and/or evaluate the phone assistance team routing form (i.e. more road trips).  
By: August 31, 2001
    - (b) Continue totaling calls and site visits from CTAP database every two weeks and report in OVC bi-weekly. Develop report for C/E Team and Assistant Commissioner for planning purposes.
    - (c) Monitor employee use and evaluate responses in CTAP database through monthly report runs.
    - (d) Develop COP and instructions for managers on running CTAP database reports.  
By: September 30, 2001
    - (e) Update COP/instructions for staff using CTAP database.  
By: September 30, 2001
- b) Provide quality assistance to all callers who contact IDEM.  
Meet and train new person at IDEM front desk whenever turnover occurs.
- c) Provide high quality compliance assistance for all on-site visits.
  - (1) Develop an electronic audit tool for on-site/prioritization.  
Activities include the following:
    - (a) Research and gather existing IDEM audit tools (inspector checklists, multi-media checklists).  
By: August 30, 2001
    - (b) Develop additional audit tools to fill in gaps of existing tools.  
By: December 31, 2001
    - (c) Develop presentation for OVC staff that covers final audit tool.  
By: January 31, 2002
    - (d) Present audit tool to OVC staff.  
By: February 28, 2002
  - (2) Promote on-site assistance through targeted distribution (i.e. agency and office priorities such as salvage yards, metal casting...) of CTAP marketing brochure throughout the two years.
    - (a) Distribute at least 2,000 brochures.  
By: July 1, 2002
    - (b) Distribute another 2,000 brochures.  
By: July 1, 2003
  - (3) Complete 150 on-site visits by the regional offices and the Indianapolis office.  
By: January 1, 2002

- (4) Conduct an additional 150 on-site compliance assistance visits.  
By: July 1, 2002
  - (5) Complete an additional 150 on-site compliance assistance visits.  
By: January 1, 2003
  - (6) Complete an additional 150 on-site compliance assistance visits (600 total).  
By: July 1, 2003
- d) Provide quality regional compliance assistance for targeted sectors.
  - (1) Participate in salvage yard workgroup including assisting with workshops.  
By: December 31, 2002
  - (2) Hold 5 regional workshops on compliance issues/reuse opportunities for the waste tire sector.  
By: June 30, 2002
  - (3) Assist IDEM's Agriculture Liaison with compliance assistance for the Confined Feeding Operations sector. The assistance will include managing a contract to develop a compliance assistance video.
  - (4) Hold 1 workshop on issues for the metal casting industry relating to the EPA Sustainable Industries Project.
- e) Build and coordinate effective and cooperative working relationships with program areas by attending internal meetings and joint office meetings.
  - (1) Work with OAQ, OLQ and OWQ staff to set up training sessions on one topic for each office every six months.
  - (2) Assist the Office of Enforcement, as part of the Pollution Prevention Integration Project, in increasing the number of acceptable Pollution Prevention SEPs in enforcement actions. The Multi-media Enforcement Tracking database will be used to track progress.
  - (3) Meet, as needed, with the program areas on joint agency priorities to track progress on each.
- f) Offer Technical Assistance through Inspection and Enforcement Referrals
  - (1) Contact facility to determine possible assistance efforts within 10 business days of assignment.
  - (2) Perform on-site visit, if necessary, within 30 business days of contact.
  - (3) Provide progress/update information into CTAP database within 5 business days after closure.
  - (4) Follow-up development and tracking.
- g) Education and Outreach

Continue to develop and distribute educational outreach materials through public outreach and training sessions regarding environmental requirements, compliance methods, voluntary environmental audits, and pollution prevention technologies. (IC 13-28-3-2)

  - (1) Provide general compliance education to our external customers on technical issues, upon request.
    - (a) Outreach

Provide staff attendance or booth displays at the following conferences, and workshops: State Fair, Black Expo, Governors Conference on the Environment, Indiana Association of Cities and Towns annual conference.

(b) Small Water Compliance/Compliance Assistance Strategy

- Assist OWQ in developing Small Operations Strategy (SOS) to identify and evaluate systems with operational and compliance problems.

By: October 1, 2001

- Assist OWQ in screening and prioritizing systems with identified problems based on health and environmental problems.

By: October 1, 2001

- Assist OWQ in identifying and developing tools to be used in assisting small systems including financial, management and technical components and develop criteria and source for the financial assistance fund.

By: December 1, 2001

- Assist OWQ in developing system to quantify health and environmental improvements.

By: December 1, 2001

- With OWQ, assist 36 small systems in water, wastewater or both.

By: June 30, 2003

(c) Integrated Pest Management (Assisting OPA)

- Assist OPA in finishing pilot program with childcare facilities and schools.

By: December 31, 2001

- Assist OPA in implementing the models at schools and childcare facilities.

By: June 30, 2003

- Assist OPA in developing an outreach plan to reach additional childcare facilities on implementing IPM.

By: June 30, 2002

- Also, assist OPA in implementing the plan.

By: June 30, 2003

- Assist OPA in finalizing and implementing a plan to distribute the curriculum to childcare facilities.

By: June 30, 2003

(d) Mercury Education

- Assist OPA in continuing mercury programs to educate businesses, industries, and citizens of Indiana.

Through: June 30, 2003

- Assist OPA/IDEM in mercury inventory project – specifically for dentists, hospitals and salvage yards.

(e) Child Care Education

- Assist OPA in marketing the childcare training video and the manual along with other 5 star tools.

By: June 30, 2002

- Assist OPA on developing an environmental education curriculum for childcare facilities.

By: June 30, 2002

- Assist OPA on partnering with Cinergy and Lilly to work in Environmental Justice areas in assisting the facilities to be apart of the 5-Star program.

By: June 30, 2003

(f) Hospital Mercury Reduction Program

- Develop plan to transition facilitation and managing of quarterly Hospital Advisory Group meetings to association or other current member after evaluating the results of the program.
- Continue to work with hospitals throughout the state in holding mercury thermometer exchanges.
- By July 1, 2003, at least five hospitals will have held a mercury thermometer exchange with over 500 thermometer exchanges occurring.

(g) Metal Finishers 5-Star Program (in cooperation with USEPA)

- Develop postcard/application for 5-Star program.

By: August 1, 2001

- Publish announcement of 5-Star program in "Indiana Environment", put field filling PDF copy on web and mail copies of 5-Star application to interested Indiana metal finishers.

By: January 1, 2002

- Recognize first 5-Star Program metal finishers.

By: March 15, 2002

- Recruit 10 metal finishers into the program.

By: January 1, 2003

- Evaluate the need to continue program after one year.

(h) Sectors

Continue to educate the following sectors: drycleaner, vehicle maintenance, childcare, Heating Ventilation and air-conditioning Pledge, collision repair, metal finishing and fiberglass reinforced plastics.

- Develop email distribution system for updating the wood finishing and fiberglass sectors on regulations.

By: August 30, 2001

- Evaluate the success of each 5-Star program and make recommendations on the future of each program.

By: August 30, 2001

(2) Create sector specific compliance information.

(a) Printers

- Create postcard announcing new manual with web address and send out to Indiana printers.

By: August 1, 2001

- Develop manual for web site, if approved by PII.

By: August 15, 2001

- With Printer's Advisory Committee input develop strategy for outreach.

By: September 1, 2001

- Implement strategy

By: June 30, 2002

(b) Auto Refinishers

- Create postcard announcing new manual with web address and send out to Indiana auto refinishers.

By: November 1, 2001

- Distribute manual through 5 regional workshops.

By: July 1, 2002

- Update manual, obtain OLC approval and put on web site.

By: April 30, 2003

(c) Styrene/Wood Finishers

- Update manual, obtain OLC approval and put on web site.

By: April 30, 2002 and April 30, 2003

- Communicate, at a minimum, biannually with the styrene and wood-finishing sector.

(d) Childcare Facilities

- Update manual, obtain OLC approval and put on web site.

By: April 30, 2002 and April 30, 2003

- Facilitate 5-Star awards review committee meetings at least biannually.
- Continue development of a newsletter (biannual) to 5-star participants with a focus on a specific subject each season (fire prevention, chemical safety, mercury clean out, lead safety, asthma, ozone awareness, etc.) The newsletter shall be developed for OPPTA's web site.

(e) Vehicle maintenance

- Convert manual to Word.

By: December 31, 2001

- Update manual, obtain OLC approval and put on web site.

By: April 30, 2002 and April 30, 2003

- Develop plan to address long term needs of sector and continued assistance, including recommendations and work with trade association.

(f) Drycleaners

- Update manual, obtain OLC approval and put on web site.

By: April 30, 2002 and April 30, 2003

- Explore transitioning manual and 5-star program to trade association.

(g) Metal Casting Industry (Joint Project with EPA Headquarters)

- Work with Indiana Cast Metals Association (INCMA) and Department of Commerce on developing and marketing foundry sand reuse opportunities and finalizing the National reuse guidance to states and industry.

By: July 1, 2002

- Assist in implementing environmental management systems at 5 to 10 small metal casting facilities.

By: July 1, 2003

- Facilitate the finalizing of the National New Source Review (NSR) guidance for metal casting facility operators and regulators. This document will be initially drafted by EPA, then tailored by IDEM to meet Indiana specific needs.

By: June 30, 2002 — Final document completed

- Assist Indiana participating facilities in meeting goals that complement the “Industry of the Future” program that metal casters have established with the U.S. Department of Energy.

(3) Update Compliance and Technical Assistance Program web page and supporting documents each quarter.

(4) Manage OPPTA’s web site including the following activities:

- (a) Review new pages within 5 working days for proper format.
- (b) Update/track OPPTA “web hits” on a monthly basis and report to OPPTA’s managers.
- (c) Ensure links and format is consistent throughout all of web site quarterly.

(5) Environmental Management Systems

- (a) Assist three state government facilities in implementing an environmental management system (based primarily on ISO-14001) as outlined in memo of understandings and Governor O’Bannon’s Greening the Government Initiative.
  - Develop for review and comment by the government facility all documents, guidelines and procedures relevant to an environmental management system.

By: June 30, 2002

- Prepare a final report to include recommendations on future environmental management system activities within state government, costs associated with implementation, cost savings and recommendations for pollution prevention, source reduction and recycling including specific fiscal impact analysis of the pilot facilities.



By: July 31, 2002

- Develop follow-up survey.

By: July 31, 2002

- Review the follow-up survey from each government facility.

By: June 30, 2003

- (b) Manage Environmental Performance Track applications, as submitted and according to EPA's schedule, and develop recommendations on whether each facility merits entrance into the program based on compliance history. IDEM and EPA shall coordinate regarding facilities without a certified EMS or who are randomly picked to be visited.
  - (c) Evaluate other possible uses of EMS's and the quantity and depth of inspections for facilities that have comprehensive EMS's in place.
- h) Provide administrative and technical support for the compliance advisory panel. (IC 13-28-3-2 (7))
- (1) Coordinate with Office of Business Relations for support of this legislative committee.  
Provide administrative support for the compliance advisory panel, create agenda and provide meeting notes.
  - (2) Prepare a compliance and technical assistance annual report for the web. (IC 13-28-3-3)
    - (a) Prepare a biannual summary (executive summary) of technical assistance efforts for appropriate distribution.
- By: December 31, 2001; June 30, 2002; December 31, 2002; June 30, 2003
- (b) Prepare a technical and compliance assistance annual report each fiscal year through the Compliance Advisory Panel report.
    - Complete draft report
- By: January 31, 2002 and January 31, 2003
- Complete final report
- By: February 28, 2002 and February 28, 2003
- (c) Prepare an executive summary of the annual report.
    - By: February 28, 2002 and 2003
  - (d) Publish to web and provide notice to legislature and copies to Environmental Quality Service Council and the Governor.
- (3) Prepare a Small Business Assistance Program (SBAP) Annual Report
- (a) Prepare a Small Business Assistance Program report each year.
    - Complete draft report
- By: February 15, 2002 and February 25, 2003
- Complete final report
- By: March 1, 2002 and March 1, 2003

- (b) Provide copy to EPA small business assistance office.
  - (c) Perform analysis on National SBAP report data and provide to Assistant Commissioner.
- i) Insure all inquiries to the Office of Voluntary Compliance are kept confidential. (IC 13-28-3-4)  
Confidentiality Policy
  - (a) Review confidentiality procedures with Assistant Commissioner and Office of Legal Counsel annually and update as needed.
  - (b) Provide annual refresher training to Operations staff providing confidentiality training.

## 19. SOUTHWEST REGIONAL OFFICE

Judy Dicus Thomann  
 Director  
 Southwest Regional Office  
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The Southwest Regional Office serves the counties of Crawford, Daviess, Dubois, Gibson, Knox, Martin, Orange, Perry, Pike, Posey, Spencer, Vanderburgh, and Warrick in southwest Indiana by providing a local access to permits, inspection reports and general information on environmental activities with State, municipal, and industrial facilities. In addition, staff of the Southwest Regional Office answer questions from the public on a wide range of environmental subjects and represents the environmental community at important gatherings.

### 1) **OAQ – Air Compliance**

- a) Provide technical assistance and outreach to two (2) communities in partnership with OPPTA on compliance with Open Burning regulations.

By: June 30, 2002

### 2) **OAQ– Air Compliance**

- a) Work with the Department of Natural Resources (DNR) to develop a Current Operating Procedure (COP) or Memorandum of Understanding (MOU) addressing the handling of Fugitive Dust complaints from coal mine blasting.

By: June 30, 2002

### 3) **OLQ – AG/Solid Waste Compliance**

- a) Provide limited emergency response back-up for OER On-Scene Coordinator.

By: June 30, 2002

- b) Reenergize efforts to resolve compliance issues at the closed Thais Landfill in Knox County.

By: June 30, 2002

### 4) **OLQ – Underground Storage Tanks Compliance**

- a) Identify unregistered USTs currently in operation in Vanderburgh County and develop a targeting list for future compliance work with Office of Enforcement.

By: June 30, 2002

### 5) **OAQ – Asbestos/lead Compliance**

- a) Meet with the Evansville Brownfields Coordinator once per quarter to exchange information relating to Asbestos/ Lead issues relating to Brownfields projects in Evansville.

By: June 30, 2002

- b) Provide education and outreach to twenty-five (25) contacts in the region (including town representatives, mayors, health department inspectors).

By: June 30, 2002

**6) OWQ – Drinking Water Compliance**

- a) Attend three (3) after hours Town/Water Board meetings to provide education and technical assistance regarding compliance with drinking water standards.

By: June 30, 2002

**7) OER – Emergency Response**

- a) Coordinate efforts with Region V EPA to resolve long-term contamination issues at specific sites in the Southwest Regional area.
  - Dillion Oil Field – Dubois County
  - Cub League Baseball Field – Knox County

Ongoing

**8) OWQ – Wastewater Compliance**

No priorities identified for this media due to vacant PCN.

**9) OPPTA – Source Reduction and Recycling**

- a) Provide education and outreach to two (2) governmental entities toward the development and implementation of illegal open burning and open dumping ordinances.

By: June 30, 2002

- b) Work with two (2) municipalities to identify toxic and other environmental issues to encourage the implementation of P2 applications (chemical & energy) where possible.

Ongoing: Through June 30, 2002

**10) SWRO – Outreach & Education Priorities**

- a) Meet with 15 Mayors from SW region on a quarterly basis.  
(Total: 15 mayors X 4 quarters = 60 meetings)

Ongoing: Through June 30, 2001

- b) Meet with 8 Legislators from SW region at least twice.  
(Total: 8 legislatures X 2 meetings = 16 meetings)

Ongoing: Through June 30, 2001

**11) SWRO – Outreach & Education Priorities**

- a) Make contacts with at least 5 local organizations, environmental groups and/or local agencies, to allow our participation or presentations on local environmental events.

Ongoing: Through June 30, 2002

- b) Conduct 6 educational training meetings on the most pressing issues in the region.

Ongoing: Through June 30, 2002

- c) Meet with 10% of town councils to explain IDEM's role and/or offer assistance.

Ongoing: Through June 30, 2002



## 20. OFFICE OF WATER QUALITY

Tim Method  
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NOTE: These water office priorities are in addition to all the water-related priorities listed in the agency-wide priority Focus on Water Quality.

### A. OWQ — Agency-Wide Priorities

#### 1) *Promote Watershed Approach*

- a) Develop 6-Basin Coordinator staffing package.

By: July 1, 2001

- b) Approval of 6-Basin Coordinator staffing package.

By: October 1, 2001

- c) Hire 6-Basin Coordinators to assist local watershed efforts.

By: January 1, 2002

- d) Secure TMDL Lab space.

By: September 1, 2001

- e) Complete TMDLs scheduled 2002 & 2003 and submit for EPA approval.

Measures:

- FY 2002: 5 segments in the Grand Cal/Indiana Harbor Ship Canal
- FY 2003: 13 segments (contracting)
- Fall Creek - 1 impairment
- Pleasant Run - 1 impairment
- 3 segments White River in Marion County - 3 impairments
- The Kankakee River - 1 impairment
- 3 segments of the Little Calumet - 4 impairments
- Burns Ditch - 1 impairment
- Salt Creek - 1 impairment
- Lake Michigan Shoreline - 1 impairment
- Trail Creek - 1 impairment

By: June 30, 2003

- f) TMDL listing and de-listing rule implemented.

By: January 1, 2003

- g) Consider and implement selected suggestions proposed by the TMDL Advisory Group.  
By: June 30, 2003

- h) Update and revise IDEM's water quality monitoring strategy to conform to US EPA's new guidance of 10 elements of an adequate state ambient water monitoring and assessment program.  
By: June 30, 2003

## **2) Permitting and Compliance**

- a) All 107 CSO communities with CSO LTCP required in NPDES permit.  
By: January 1, 2002
- b) Audit 24 CSO communities on LTCP implementation.  
By: January 1, 2003
- c) MS4-Phase II Storm Water Rule implemented.  
By: March 31, 2003
- d) Complete and Implement Overloaded Facilities Policy.  
By: September 1, 2001
- e) Receive Pretreatment Delegation.  
By: October 1, 2001

## **3) Smaller System Compliance Strategy**

- a) Develop Small Operations Strategy (SOS) Plan.  
By: October 1, 2001
- b) Implement SOS Technical Assistance w/ statewide mentoring program.  
By: December 1, 2001
- c) Identify and develop criteria for SOS Financial Assistance Fund.  
By: October 1, 2001

## **4) Remove NPDES Permit Backlog for active permits which do not have current WQS**

- a) EPA approved NPDES schedule of issuance.  
By: July 1, 2001
- b) Revise necessary NPDES permit issuance policies.  
By: October 1, 2001
- c) Rules implemented for SEA 431 and Triennial elements.  
By: June 30, 2003
- d) Develop new NPDES reporting database to reliance on federal PCS wastewater data system.  
By: January 1, 2003



- e) Implement new NPDES reporting database.

By: June 30, 2003

#### **5) *Protecting Wetlands***

- a) Develop rule language for State Wetlands Permit.

By: September 1, 2001

- b) Adopt and Implement new Wetland WQS, State permit and 401 WQC.

By: January 1, 2002

- c) Develop Wetland Compliance and Enforcement Plan.

By: January 1, 2002

- d) Develop Wetlands Monitoring Strategy.

By: June 30, 2002

#### **6) *Implement Groundwater Quality Standards***

- a) Adopt new GWQS.

By: August 1, 2001

- b) Implement rule reviews for IDEM, DNR, and DOH for new GWQS.

By: December 1, 2001

- c) Groundwater Data survey.

By: October 1, 2001

- d) Groundwater Data GAP analysis.

By: January 1, 2002

- e) Develop GW Data Strategy.

By: June 30, 2002

#### **7) *Retain Primacy for Safe Drinking Water Act Program***

- a) Develop DW Staffing Package.

By: July 1, 2001

- b) Approval of DW Staffing Package.

By: October 1, 2001

- c) 200 completed Wellhead Protection Reviews.

By: June 1, 2002

- d) Implement Capacity Development for 50 community systems.

By: June 30, 2002

- e) 3600 PWS Completed Source Water Assessment reviews.

By: June 30, 2004 (2000 by June 30, 2003)

- f) Adopt and implement new rules under the Safe drinking Water Act. Complete within 2 year primacy extension.

**8) C/E Team Compliance Strategy Implementation**

- a) Implement Compliance-Enforcement COP
- b) When developed, implement inspection protocols
- c) Assist with "sector" projects and other initiatives developed by the CE Team

**9) New Permits Issued on time**

- a) NPDES permits
- b) Wastewater Construction Permits
- c) Drinking Water Construction Permits
- d) Meet all mandated deadlines 100% of the time.
- e) Establish internal targets for review periods for all permits/approvals/licenses without statutory/rule deadlines and meet these 100% of the time.

By: June 30, 2002

- f) Make final decisions on all pending operating permit renewals and remain current.
- g) Meet permit schedule per Water Quality Focus agency priority.
- h) Evaluate permit resources and make recommendations as needed to maintain effective permit programs

- (1) Evaluate wastewater and drinking water programs for further opportunities to establish general permits or permit by rule.

By: December 1, 2001

- (2) Establish schedule for identified opportunities and implement.

By: June 30, 2003

- (3) Review NPDES permits and update for consistency, clarity and simplicity.

By: June 30, 2002

- i) Revise permit processing protocols to be consistent with the concept of Environmental Justice—including staff training (not limited to permits staff) and the delineation of EJ areas—and develop strategies for addressing permitting requests in EJ areas. Evaluate all permitting public notice processes with respect to enhancing public participation

**10) Mercury Assessment and Evaluation**

- a) Using assessment tools such as data gathering and analysis, OWQ will provide valuable/key information to IDEM's mercury water quality planning efforts as part of a regional and local strategy. Data would include the USGS/IDEM mercury monitoring project, trace metals sampling in surface water, fish tissue sampling data.

By: December 31, 2002 / June 30, 2003

- b) OWQ will research available information on mercury releases and identify key mercury contributors in Indiana and assemble best available mercury inventory.

By: December 31, 2002

**11) Rulemaking**

Office of Water Quality (OWQ) should establish workplan and schedule for critical rulemakings per Water Quality Focus priority.

By: June 30, 2002

**12) Dis-investments**

- a) OWQ will create an inventory of specific functions. Each function will be evaluated by a qualitative system developed to identify discretionary, low priority and/or under funded activities.

By: October 1, 2001 — Create inventory.

By: November 1, 2001 — Evaluate functions.

- b) IDEM will review the completed inventory and make recommendations to the Commissioner for any realignment of resources.

By: December 31, 2001

- c) The above review will be repeated on the same schedule.

During: calendar year 2002

**13) Identify pollutants that pose risks to public health and the environment through a cross-media review, and identify agency initiatives to address them.**

- a) Conduct integrated analysis of results of ToxWatch study, National Air Toxics Assessment, Cumulative Risk Initiative, Toxics Release Inventory, Office of Water Quality metals sampling and other screening tools to identify pollutants, industries, or geographic areas of concern.

By: June 1, 2002

**14) Develop and implement agency initiatives to address sources of such pollutants, using pollution prevention, technical assistance, rule changes, compliance and other available tools.**

By: June 30, 2003

**15) Pollution Prevention**

- a) Mercury Policy and Rules  
Develop model mercury reduction programs and policies to include in pollution prevention minimization plans required under the Great Lakes Initiative. The effort would go beyond the vague guidance used by other states, and require publicly owned treatment works to put in place mercury P2 programs in exchange for effluent variance.
- b) P2 Targeting in Waste Water Inspections  
Initiate P2-oriented compliance inspection procedures focusing on OWQ's assessment of opportunities for significant improvement in National Pollutant Discharge Elimination System compliance at rural schools.
- c) P2 in Drinking Water Operations  
Develop a resource list of pollution prevention opportunities for public water supply systems. Explore the possibility of including pollution prevention in the operator certification program, to include operator training and certification exams.
- d) P2 in Wastewater Treatment Plant Operator Certification

Incorporate pollution prevention concepts into the wastewater treatment plant operator certification program. Levels of expected understanding in P2 will be graduated to be consistent with the various levels of professional certification.

## B. OWQ — Office-Wide Priorities

### 1) Surface Water Quality Monitoring Strategy Implementation

- a) 2001-02, 6th Year 2nd Rotation: West Fork White River and Patoka River Basins
- b) 2002-03, 7th Year 2nd Rotation: East Fork White River and Miami River Basins
- c) Beginning 2002-03 to include Groundwater and Wetlands monitoring

### 2) Surface Water Quality Monitoring Strategy

#### Sampling Sites: Planned vs. Actual

Measures of Success	W.F. White River		Patoka River	
	Planned	Actual	Planned	Actual
(Sampling Categories)				
Water Column Chemistry	56	0	57	0
E. coli	82	0	18	0
Pesticides	22	0	6	0
Sediment	28	0	5	0
Fish Tissue – Watershed	25	0	18	0
Fish Tissue – Targeted	33	0	8	0
Fish Community – Watershed	42	0	30	0
Macro Invertebrate – Watershed	14	0	7	0
Macro Invertebrate – Community (Kicks)	25	0	0	0
Macro Invertebrate – Community (H-D)	20	0	6	0

- Table 2: Surface Water Monitoring Sampling Sites

NOTE: Fish Tissue @ US EPA National Lake Study . . . 3 planned site visits.

### 3) Fish Consumption Advisory

- a) Revision for Advisory completed

By: March 31, 2002

- b) Issue Advisory jointly with DNR and ISDH.

By: June 15, 2002

### 4) Water Quality Reporting

- a) Draft 305(b) Report

By: January 15, 2002

- b) Final Draft 305(b) Report

By: April 1, 2002

- c) Draft 303(d) Report

By: October 1, 2002

- d) Final 303(d) Report

By: April 1, 2003

#### **5) Watershed Restoration Strategies and Unified Watershed Assessment**

- a) Complete WRAs for all 38 Eight-digit HUC watersheds.

By: January 1, 2003

- b) Coordinate work with Basin Coordinators to begin implementation of plans.

By: March 3, 2002

- c) Complete additional UWA level to the 14 digit-HUC level where appropriate.

By June 30, 2002

#### **6) Issue and Management of Water Quality Federal Grants**

- a) Issue \$5 million to recipients of 319 grants/year for nonpoint source reduction projects.

- b) Issue \$250,000 of 104(b) alternative NPDES program grants.

- c) Issue \$250,000 of 205(j) water quality planning grants.

#### **7) Major Rule Development**

- a) SEA 431 elements as required

By: June 30, 2003

- b) Triennial WQS

By: June 30, 2003

#### **8) State Revolving Fund Loans**

- a) Issue \$200 million in wastewater loans

By: June 30, 2002

- b) Issue \$50 million in drinking water loans

By: June 30, 2002

- c) Issue \$225 million in wastewater loans

By: June 30, 2003

- d) Issue \$50 million in drinking water loans

By: June 30, 2003

#### **9) Database Management**

- a) Complete integration of biological data into AIMS database

By: December 31, 2001

- b) Begin development of new NPDES reporting database

By: September 1, 2001

- c) Develop new NPDES reporting database

By: January 1, 2003

- d) Implement new NPDES reporting database

By: June 30, 2003

**10) Collect 100% NPDES permit fees**

- a) \$4,000,000 in FY2002
- b) \$4,000,000 in FY2003

**11) Multi-media Inspections**

- a) Wastewater and Drinking Water "1" and "2" level inspection staff
- b) Follow up referrals from other programs.

**12) C/E Team Compliance Strategy Implementation**

- a) Implement Compliance-Enforcement COP
- b) When developed, implement inspection protocols
- c) Assist with "sector" projects and other initiatives developed by the CE Team

**13) New Permits Issued on time**

- a) NPDES permits
- b) Wastewater Construction Permits
- c) Drinking Water Construction Permits

**14) Implement existing rules under the Safe Drinking Water Act**

- a) Follow State-EPA Annual Resource Deployment Plan
- b) Introduce and include P2 awareness into the Operator Certification Program

**15) GPRA Goal Setting**

OWQ will work with EPA to help finalize a set of joint goals and priorities related to water and drinking water.

### III. US EPA Region 5 Priorities

EPA has determined that the joint and regional priorities set forth in this EnPPA will further the agency's strategic goals as outlined in the EPA Region 5 "Agenda for Action", a strategic planning document that tailors goals laid out in the EPA's National Strategic Plan (available on the Internet at <http://www.epa.gov/ocfopage/plan/plan.htm>) to identify and solve environmental concerns specific to our region.

The region's most current Agenda for Action can be found on the internet at <http://www.epa.gov/region5/about.htm>. As of the signature date of this agreement, the current EPA Region 5 Agenda for Action is dated October, 1999 and can be viewed on the Internet at <http://www.epa.gov/region5/agenda99/>.

The EPA Region 5 Agenda for Action outlines programmatic and region-specific priorities. A regional priority is one that addresses a multimedia environmental problem, needs nontraditional methods to solve the problem, needs federal leadership, is broad in scope, impacts a significant population or resource, and/or is an administration priority. Over the period of this agreement, Region 5 will pursue progress on its own regional environmental and geographic priorities. The Agenda for Action describes Region 5's general plans. While much of the region's work on its environmental priorities will be broadly applied across many of the states in the region, the region will continue to offer state agencies opportunities to assist on these priorities in any way feasible.

#### Region 5 EPA Environmental Priorities

Region 5 is currently directing attention and resources to the following list of priority environmental problems:

##### **Reducing Toxics**

Because of adverse effects to human health and the environment from toxic substances, Region 5 has made reducing toxic releases into the environment a priority. In particular, Region 5 will undertake actions outlined in the recently signed Bi-national Strategy for the Virtual Elimination of Toxic Substances and will pursue sector-specific approaches, such as the recently concluded agreement with the American Hospital Association on preventing pollution from health-care facilities.

##### **Promoting Sustainable Urban Environments and Redeveloping Brownfields**

Recent attention has been given to unplanned expansion and abandoned urban industrial sites. Region 5 will work with state and local governments, other federal agencies, and regional authorities to help identify strategies that can lead to more sustainable development and a higher quality of life for communities.

##### **Protecting People at Risk, especially Children and Environmental Justice Communities**

Children, low-income groups, and minority populations are most likely to suffer disproportionately from environmental pollution. EPA Region 5 is addressing environmental justice issues through programs and initiatives designed to improve education and community outreach, target health and environmental research, promote compliance assurance, improve public access to information, and create stakeholder partnerships.

##### **Cleaning Up Sediments**

Region 5 will continue cleaning up sediments through partnerships with states and others, as well as through the use of federal enforcement authorities. To reduce soil erosion and continuing sources of sediment pollution from non point agricultural and urban storm-water runoff, EPA will work closely with

state agricultural departments and other federal agencies as well as with Farm Bill implementation and other programs.

### **Protecting and Restoring Critical Ecosystems**

Region 5 will inventory and assess the region's most important ecosystems and, with its partners, identify problems and measures to protect and restore these natural areas. Region 5 and the state may work together by undertaking pilot projects at distinct locations in the states, incorporating an ecosystem approach into the base program, or addressing ongoing or emerging issues that are impairing the states ecological health.

## **EPA Region 5 Principal Places**

To direct limited resources to places where these priorities can be effectively addressed, the Region has identified principal places where the complex environmental problems would most benefit from a multimedia focus. Region 5 is focusing on the following places in Indiana:

### **Great Lakes**

The Great Lakes remain a priority for Region 5 EPA because of their importance as a unique ecosystem and a natural resource. EPA's Great Lakes Program brings together federal, state, tribal, local, and industry partners in an integrated ecosystem approach to protect, maintain, and restore the chemical, biological, and physical integrity of the Great Lakes. The Great Lakes Five-Year Strategy, developed jointly by EPA and its multi-state, multi-agency partners and built on the foundation of the Great Lakes Water Quality Agreement, provides the agenda for Great Lakes ecosystem management: reducing toxic substances, protecting and restoring important habitats, and protecting human/ecosystem species health.

The federal role in the Great Lakes is to steer this effort and to provide timely technical support and assistance, coordinating not only with U.S. partners, but also with Canadian counterparts. US EPA's Great Lakes National Program Office steers and coordinates activities at a Great Lakes Basin-wide level. Regional Teams and programs focus activities on Lakes Ontario, Michigan, Erie, and Superior and their Areas of Concern.

#### **Activities include:**

- monitoring lake ecosystem indicators providing
- public access to Great Lakes data
- helping communities address contaminated sediments in their harbors
- supporting local protection and restoration of important habitats
- promoting pollution prevention through activities and projects such as the Great Lakes Binational Toxics Strategy
- taking a community-based environmental protection approach, especially in areas of the Great Lakes designated Areas of Concern
- addressing emerging Great Lakes issues, including invasive species.

### **Northwest Indiana**

Northwest Indiana remains a priority for Region 5 EPA because of air pollution generated by past and present industrial and manufacturing activities in Lake and Porter counties, whose Ozone levels currently exceed national ambient air quality standards. Through the "Reducing Toxics" agency priority, IDEM's Northwest Regional Office is addressing pollution concerns in Northwest Indiana by implementing the following measures:



- Work with the EPA to complete the Cumulative Risk Initiative (CRI). Air quality data from the CRI will be used to explore the possibility of targeting requests for voluntary emissions reductions from local industries.
- Northwest Indiana Diesel Initiative

## Other areas of focus for EPA

### Pollution prevention

The Pollution Prevention Act of 1990 established that pollution should be prevented or reduced at the source whenever feasible. Integration of pollution prevention into all environmental management approaches in the long term is the responsibility of all environmental programs. Region 5 supports pollution prevention throughout regulatory and voluntary programs in the following ways:

- Including pollution prevention projects in compliance and enforcement settlements
- Providing pollution prevention technical assistance during inspections
- Including pollution prevention language in environmental permits
- Reviewing regulations to determine whether they impede pollution prevention
- Making pollution prevention information available to states, local entities and industries
- Training environmental staff
- Supporting and promoting voluntary programs that reduce pollution at the source, such as the Green Lights and Waste Wise programs
- Supporting voluntary sector initiative projects, such as the Great Printers Project, the Strategic Goals Program, and the National Performance Track Program.

### Data Management

Region 5 is committed to using quality data to make complex decisions for environmental management, and realizes that both IDEM and Region 5 share responsibilities to collect, store, and report data. Region 5 will work with the state agency to facilitate information sharing. Region 5 will engage states in participating in the following project areas:

- collect, assure the quality of, and store key data from facilities
- assess and implement national data standards for facility and chemical identification coding
- develop and implement improved data-sharing processes to share data, information, and analyses
- improve electronic communications and links (EMPACT, Envirofacts warehouse)
- help reduce redundant reporting by programs such as One-Stop reporting
- improve joint processes with states through workshops and regional meetings.

### Regulatory Innovation

In 1995, EPA undertook a national effort of regulatory innovation, with the goal of finding cleaner, cheaper, and smarter ways of protecting the environment. Region 5 is actively involved in several innovation areas. Under the Common Sense Initiative, Region 5 works with selected industrial sectors on improving performance and efficiency, in particular with the metal finishing sector. Region 5 is developing projects under Project XL to test innovative approaches that may require flexibility from federal rules and regulations. Region 5 will support IDEM's effort to develop appropriate reinvention projects and will work with the state agency to develop a workable process for reviewing such proposals.

## **IV. Roles of IDEM and US EPA Region 5 under this Agreement**

At its core, this agreement defines the roles that both IDEM and US EPA Region 5 will play in protecting the environment and public health in the state of Indiana and maximizing efficient use of each agency's limited resources.

IDEM and US EPA Region 5 recognize the primary role of IDEM in administering federal environmental programs delegated to the state under federal law and in carrying out state programs prescribed under state law. Beyond this, US EPA Region 5 recognizes the commitment of IDEM to using all of its authorities to protect the environment and health of the citizens of Indiana. The federal role played by US EPA Region 5 in assisting the state includes: addressing multi-state or national issues directly; implementing programs not delegated to IDEM; and working on targeted sectors, watersheds, airsheds, or regions in conjunction with IDEM.

Several activities are common to both IDEM and US EPA Region 5, such as permitting, compliance, enforcement, monitoring, and outreach. Permitting is perhaps IDEM's most visible activity. Federal and state statutes require businesses and communities to obtain permits to ensure protection of human health and the environment. Permits are one means of controlling environmental impacts. They promote monitoring and the collection of invaluable data. Ensuring compliance with permit or statutory requirements remains a high priority with both agencies. We employ an integrated set of compliance assistance, compliance monitoring and enforcement tools to encourage and ensure compliance with the law, correct environmental problems and deter future violations. US EPA's research and both agencies' environmental monitoring efforts are the foundation for many of our activities and are essential for improving services and strengthening our ability to carry out mandates. In summary, both agencies agree to the following basic partnership roles:

### **IDEM**

- Delegated federal programs administration
- Permit review and issuance
- Enforcement/facility inspections
- Compliance assistance
- Public outreach and education
- State environmental programs administration
- Customer service
- Technical assistance

### **US EPA Region 5**

- Permit peer review for delegated programs
- Permit issuance for non-delegated programs
- Enforcement/facility inspections
- Compliance assistance
- Public outreach and education
- Ensure national consistency
- Address interstate issues

- Technical assistance to IDEM
- Review of federal programs delegated to state

The federal government has a fundamental responsibility arising from several acts of Congress to ensure the integrity of the nation's environment and the health of its diverse citizenry. Since pollution does not respect political boundaries, US EPA must ensure that a consistent, level playing field exists across the nation. US EPA Region 5 provides leadership in addressing environmental problems that cross state, regional and national borders. Region 5 works with its many partners--other federal agencies, states, tribes, and local communities--to address high priority environmental problems. Region 5 also reviews state program performance and assists states and other partners in building their capacity to ensure protection of public health and the environment. Region 5 will continue to provide Indiana with funding for its base programs and specific projects which will achieve environmental results consistent with Region 5 and IDEM priorities set forth in this agreement and will evaluate Indiana's programs to ensure fiscal integrity. The Region will continue to build state capacity for undelegated programs with a goal of delegating those programs to the state in the near future.

This agreement is based on the commitments made by IDEM when federal programs were delegated to the agency. IDEM recommits to carry out the provision of those delegation/authorization agreements. This agreement serves as a guide to implementation, but does not supersede any existing federal statute, regulation, cooperative program agreements or other agreements in support of program delegations. US EPA Region 5 and IDEM RCRA compliance assistance staff will meet annually to exchange information about the compliance assistance tools each has developed to assist the RCRA regulated community.

## **V. Measuring Environmental Results**

Under the NEPPS, state and federal program managers are directed to focus more on "improving environmental results." To achieve this new focus, the NEPPS calls for setting environmental goals and using environmental performance measures (i.e. indicators) to keep better track of our progress.

Both IDEM and US EPA Region 5 have experience working with characterization of environmental conditions. IDEM has historically collected ambient environmental quality data and reported its findings. However, we must improve linkages between actual environmental conditions and program performance, so that we can better assess our effectiveness over time. NEPPS should also help us to apply our resources where they will do the most good.

IDEM uses indicators as the tools to assess progress toward achieving the goals and objectives set throughout this agreement. US EPA Region 5 has encouraged states to adopt outcome- and output-oriented performance measures to track environmental conditions and trends, business environmental performance, and program performance.

IDEM developed indicators for the first time for the Fiscal Year 1997 EnPPA. Since then, the department has worked to refine its indicators. That process involved scientific and regulatory review by IDEM staff, active participation in national discussions regarding EPA core performance measures, as well as stakeholder review of the proposed indicators.

### **Core Performance Measures**

At the national level, states have been working with US EPA to develop core performance measures that define the accountability of national environmental programs, directing them toward the desired environmental goals and objectives. Both Indiana and US EPA Region 5 have been active participants in this effort.

IDEM intends to supply EPA Region 5 with all applicable core performance measure information as outlined in the ECOS/EPA document, except where IDEM and EPA Region 5 have agreed.

## **VI. Relationship of Agreement to Grants**

A performance partnership grant (PPG) is a single grant made to a state that combines funds which would otherwise be available through the individual categorical grants. The PPG is designed to provide maximum administrative and programmatic flexibility to states, allowing the combination of up to sixteen eligible categorical grants. The EnPPA replaces the categorical work plans for the grants that IDEM has combined.

The PPG and the EnPPA together are the primary tools for implementing the new management perspective leading to differential oversight of US EPA programs. This new perspective provides an incentive for state programs to perform well, rewarding strong state programs and freeing up federal resources for high priority environmental problems.

The benefits of combining the categorical grants into the PPG are:

- flexibility in addressing environmental priorities (both in terms of the types of activities and the level of resources),
- cost savings in addressing priorities through multi-media approaches,
- allowing the public to see the goals, objectives and resources (tax dollars) and how they are used; and
- reducing administrative efforts.

IDEM reporting requirements for the PPG will include financial and programmatic elements. The financial reporting will be completed annually with the submittal of a financial status report (FSR). Programmatic reporting will be fulfilled with the submittal of notes and materials from quarterly partnership meetings and the Midterm Partnership Meeting as described in Section 4 (starting on page 189).

## **VII. Quality Assurance (QA) and Quality Management Plans (QMP)**

For the State FY 2001-2003 EnPPA agreement, IDEM is operating under the IDEM Quality Management Plan (QMP) which was signed and approved by EPA and became effective on August 10, 2001.

The QMP, which documents IDEM's Quality System (quality assurance policies and procedures), is consistent with the EPA QA/R-2 document entitled, *EPA Requirements for Quality Management Plans*, and the ANSI/ASQC E-4-1994, *Specification and Guidelines for Environmental Data Collection and Environmental Technology Programs*, developed by the American National Standards Institute and the American Society for Quality. The goals of the Agency-wide Quality System are to ensure that environmental programs and decisions are supported by data of the type and quality needed and expected for their intended use.

IDEM hired an Agency-wide Quality Assurance Manager (IDEM QA Manager) in mid-February 2001, who was initially responsible for coordinating the final development of the written Quality Management Plan. During the 2001-2003 EnPPA cycle, the IDEM QA Manager will be responsible for coordinating the implementation and assessment phases of IDEM's Quality System as described in the QMP.

The IDEM QA Manager is in the process of scheduling meetings with the Quality Assurance Team (comprised of Program contacts who helped with the production of the QMP document), Senior Managers, and other Program Quality Assurance/Quality Control (QA/QC) staff to develop the policies and procedures required to implement and assess IDEM's Quality System. These policies and procedures will be developed for implementation by June 30, 2002; and the adequacy of the Quality System and QMP will be assessed at least annually with June 20, 2002, and June 30, 2003, as the assessment target dates within the 2001-2003 EnPPA cycle.

## **VIII. Data Management**

Both IDEM and Region 5 previously identified managing for environmental results as a priority for future development. An integral part of this philosophy is the collection and use of environmental data. EPA maintains a number of national databases to consolidate environmental data collected by the states. IDEM currently supplies data to many of EPA's national databases.

Traditionally, EPA and IDEM established commitments to provide data at the programmatic level. Within this agreement, IDEM makes an agency-wide commitment to continue providing data to the appropriate and applicable EPA national databases. The data shall be provided and entered under the established quality-assurance and quality-control parameters for each database.

IDEM's agency-wide data-support commitment applies only to those national databases that IDEM has agreed to support on or before July 1, 1999. Subsequent substantive changes to quality-assurance plans or additional data-base commitments should be negotiated between IDEM and Region 5. The results of these negotiations should then be included in this agreement through the established amendment process.





## Section

**2 State / Federal Relationship**

The Indiana Department of Environmental Management (IDEM) and the U.S. Environmental Protection Agency, Region 5 (EPA) share a commitment to preserving and improving Indiana's environment. Implementing a compliance assurance and enforcement program with the goal of achieving and maintaining compliance with environmental requirements by all regulated entities is a major part of this shared commitment. To guide us in this shared responsibility, EPA and IDEM agree on the following principles:

- To manage for the environmental results that support agency goals;
- To encourage and maintain compliance through the most effective and appropriate application of the full spectrum of compliance assurance/assistance and enforcement tools;
- To use our respective resources and abilities as efficiently as possible;
- To institute joint, advance planning for the most effective coordination on priority setting and work sharing arrangements;
- To engage in advance, ongoing, consultation on enforcement and compliance assurance activities to discuss initiatives, implementation efforts, and reviewing the status of both filed cases and cases being developed; and
- To conduct periodic meetings to discuss data and other available information on compliance rates, compliance trends, and causes of non-compliance to use as a basis for developing strategies to address areas of concern, including compliance problems in particular programs.

Under this EnPPA, EPA and IDEM retain their respective authorities and responsibilities to conduct enforcement and compliance activities. While specific compliance and enforcement activities to be accomplished during the term of this agreement are included in the appendices, a summary of IDEM and EPA roles in compliance and enforcement is presented here. Both agencies recognize the need for timely and open communication to identify and coordinate responsibilities, work activities and opportunities for joint actions.

## **I. Principles of IDEM / EPA Compliance Enforcement Relationship**

### **State Role**

Under federal programs for which EPA has authorized, delegated, or approved analogous State programs, IDEM will continue to assume the lead role in compliance assurance and enforcement, including compliance monitoring and compliance assistance. IDEM will be responsible for identifying and resolving in a timely and appropriate manner significant violations that it has detected. EPA will continue to provide compliance assurance and enforcement, including compliance monitoring and compliance assistance, for those federal programs, or portions thereof, which EPA cannot, or has not, authorized, delegated, or approved the State of Indiana. In addition, IDEM will coordinate with Indiana's local air pollution agencies to ensure partnerships in keeping with these principles at the local level. Multi-media compliance and enforcement activities will be coordinated through IDEM's Office of Enforcement. Multi-media compliance assistance activities will be coordinated through IDEM's Office of Pollution Prevention and Technical Assistance. The individual program offices will continue to coordinate single-media compliance activities with their media counterparts at EPA, while single-media enforcement activities will be coordinated through IDEM's Office of Enforcement.

### **Federal Role**

As an environmental steward for the nation, EPA will work to ensure that national standards for the protection of human health and the environment are implemented, monitored and enforced consistently in all states. EPA fulfills this role by implementing a federal enforcement program and by providing assistance to state programs. Therefore, in addition to taking federal enforcement actions, EPA may agree with IDEM to assist IDEM by conducting inspections and providing compliance and technical assistance to the state and its regulated entities. Specific federal responsibilities in the State of Indiana may include:

- Work on national priorities (e.g., multi-media inspections and Office of Enforcement and Compliance Assurance (OECA) priorities);
- Work on Region 5 priorities, including enforcement and compliance assurance in EPA's Principal Places. This joint approach may be used to accomplish the following: reduce toxics, especially mercury; slow urban sprawl, especially by promoting brownfields redevelopment; clean up sediments; protect and restore critical ecosystems; improve surface and drinking water quality; focus on Northwest Indiana; and protect people at risk, especially children and environmental justice communities;
- Ensure timely and appropriate enforcement in federal programs for which Indiana is approved, delegated, or authorized by EPA;
- Assure maintenance of a level playing field and national consistency across state boundaries (e.g., companies with significant company-wide non-compliance in several states);
- Address pollution which may cross state or U.S. borders (i.e., watershed, airsheds, or other geographic units);
- Address criminal violations of federal law;
- Conduct multi-media inspections and enforcement at federal facilities;
- Take enforcement actions in non-delegated, partially-delegated, or non-delegable programs;
- Take enforcement actions to assure compliance with federal consent decrees, consent agreements, federal interagency agreements, judgments and orders. EPA will coordinate activities and responsibilities with IDEM as set out below in "Joint Planning / Worksharing."

## Joint Planning / Worksharing

EPA and IDEM will share the responsibility for maximizing environmental compliance in Indiana. To that end, we agree to conduct advance, joint planning each year; to allocate the work to be done; and to assess our joint performance periodically. To facilitate joint planning, the two agencies will form a Joint Planning Team. The team will involve representatives of each program office, and IDEM's Office of Enforcement, and will focus on effective completion of both multi-media and single-media work.

The goal of this activity is to promote greater joint work planning between EPA and IDEM to achieve more efficient identification of enforcement and compliance priorities, deployment of resources, higher levels of coordination, and greater compliance. On a regular basis, senior EPA and IDEM management will discuss enforcement and compliance assurance/assistance program directions, initiatives, and tradeoffs as well as specific enforcement and compliance concerns. Specifically, EPA and IDEM will work jointly to develop priorities taking into consideration national program priorities, regional priorities, and state priorities for enforcement and compliance assurance. EPA and IDEM will develop an appropriate work share arrangement to address identified priorities in federally authorized programs and to allow coordination of activities and sharing of results.

### **In order to institutionalize this coordination effort, the following planning process will be implemented:**

There will be an annual kickoff meeting of compliance/enforcement managers from all media sections of both IDEM and EPA. This meeting should be a two-part meeting, one part multi-media and one part for the individual media to break out.

Both parts should address the following agenda items:

- recommit to the objectives of joint planning and managing for environmental results;
- explore the most effective application of the full spectrum of compliance tools;
- share draft priorities and ideas for compliance initiatives;
- identify areas of conflict or inconsistency and work toward resolution;
- agree on joint and separate roles and responsibilities;
- share successes and address challenges identified in self-assessments.

Subsequent monthly or quarterly meetings of individual media compliance and enforcement managers and multi-media meetings as needed to:

- share progress/outcomes of initiatives;
- continue work toward resolution of conflicts/challenges;
- discussion of multi-media strategies and shared work coordinated with IDEM's Office of Enforcement;
- ensure IDEM input into EPA MOA negotiations between US EPA Region 5 and Headquarters.

## Consultation on Enforcement and Compliance Assurance Activities

Ongoing communication and consultation between EPA and IDEM is critical for a smooth working relationship. Specifically, it will enable discussion of initiatives, implementation efforts, and the status of projects/cases.

Therefore, we agree on the following steps that will promote a climate that encourages compliance and enforcement personnel from EPA and IDEM to work together.

- Periodic media-specific meetings and conference calls to review the pipeline of activities and current issues (one example is to have monthly conference calls and quarterly meetings). Discussions at these sessions should include progress on the pipeline of work being shared, and current issues/problems;
- Immediate communication with management on significant changes in scheduled activities or priorities;
- Identification of contacts for individual multi-media activities;
- Institutionalization of a meaningful inter-agency communications policy which includes advance (i.e. before a decision to act is made) consultation and cooperation between IDEM and EPA as part of the decision making process for initiation of: inspections and other compliance assurance activities or any enforcement action (or addition of any source to the High Priority Violation [HPV] or Significant Non-Compliance [SNC] lists);
- Ongoing communication during the pendency of all EPA enforcement cases where violations have taken place in Indiana to enable EPA and IDEM to coordinate injunctive relief and tailor supplemental environmental projects.
- There may be emergency situations or criminal matters that require EPA to take immediate action (e.g., seeking a temporary restraining order); in those circumstances, EPA will consult with IDEM as quickly as possible following initiation of the action.

**Note:** EPA and IDEM recognize the need to maintain adequate security for all information related to any compliance or enforcement activities contemplated by either agency. Therefore, EPA and IDEM agree not to share any information concerning such contemplated activities with any person or entity outside of the two agencies without a joint agreement to share that information. EPA and IDEM agree that all staff must be aware of this requirement of confidentiality.

### **Striving For Program Evaluation through Self-Audits and Assessment**

EPA and IDEM recognize the importance of self assessments in the National Environmental Performance Partnership System and EPA's ongoing responsibility of maintaining a consistent national program across Region 5. IDEM and EPA share the view that excessive oversight of individual activities can lead to duplication of environmental protection resources. We recognize that changes in oversight techniques will be based in part on the success of the work sharing by EPA and IDEM, and on IDEM's preparedness to determine compliance effectively and take appropriate enforcement action. EPA's evaluation of IDEM's preparedness should also include a qualitative aspect, based on a mutual trust that EPA and IDEM are both committed to effectively implementing this Environmental Performance Partnership Agreement. To that end, IDEM and EPA program offices will work toward developing an understanding regarding IDEM's compliance and enforcement strategies. The self assessment process will include the following components:

- As part of the national dialogue between EPA and the States regarding Core Performance Measures, additional Accountability Measures have been identified for compliance and enforcement;
- IDEM agrees to continue entering compliance and enforcement activity data into the national data systems;
- IDEM will work toward improving its data systems in order to provide additional enforcement results information in the future. EPA will work toward focusing on whole program environmental performance, taking into account not only the number of activities conducted, but also the results of those activities, as additional results information becomes available.

## **Performance Measurement and Oversight**

Accountability measures are to be used to review patterns and trends in noncompliance and to analyze program outcomes and outputs. IDEM agrees to continue to provide facility-specific compliance and enforcement information to the automated data systems which will provide the basis for the FY 2002/2003 accountability measures.

IDEM is working toward improving its data systems in order to provide additional enforcement results information in the future. US EPA Region 5 will work toward focusing on whole program environmental performance, taking into account not only the number of activities conducted, but also the results of those activities, as the additional results information becomes available.

Both agencies agree to perform self-assessments in accordance with the Review and Assessment section of this agreement to evaluate our progress and identify challenges. The compliance and enforcement portions of those self-assessments will be discussed during the joint planning meetings. US EPA Region 5 will use differential oversight and a range of responses to assess IDEM performance, moving toward the goal of increasing its use of periodic "system level" reviews and reducing "real time" reviews of individual actions.

## **II. Improved Data and Information Sharing**

Improved data quality, data integration and information sharing will enable US EPA Region 5 and IDEM to better manage environmental programs and achieve the results we have targeted in this agreement. Specific activities we will pursue during this agreement period are detailed under the Agency-Wide Priority of Communicating with Communities. We agree that these activities should:

- Support the development of indicators and core performance measures and assess the trends they show.
- Improve our ability to assess the multiple environmental impacts of entire facilities that may contribute to Indiana's environmental problems.
- Improve our spatial ability to analyze environmental conditions and identify pollution sources that might have an impact on human health, ecosystems or economic development.
- Improve our staff's ability to access data that will aid in decision-making.
- Improve data analysis and sharing across programs.
- Improve electronic communications and linkages that will enhance our partnership to protect Indiana's environment.
- Improve processes to streamline environmental reporting for the regulated community, and evaluate and streamline current state reporting requirements for US EPA program databases.
- Improve public access to information about environmental conditions, facility compliance records, and agency activities.
- Continue to submit timely and accurate data into existing regional/national databases.

### III. Environmental Justice

The Indiana Department of Environmental Management is committed to protecting and preserving the quality of Indiana's air, water and land for all our citizens in an equitable and effective manner. An important part of that commitment is ensuring that all communities are included in a meaningful way in any environmental decision making that directly or indirectly affects them.

The concept of environmental justice includes the fair treatment and meaningful involvement of all people in the implementation of environmental decision making pursuant to all federal and state environmental statutes and rules. In addition, Title VI of the Civil Rights Act of 1964 reinforces environmental justice in that it contains non-discrimination requirements that must be followed by all recipients of federal funding.

Therefore the Indiana Department of Environmental Management intends to address both of our obligations under Title VI of the Civil Rights Act as well as our responsibility to ensure that all people in our state are included in making decisions that affect their environment by implementing an environmental justice strategy. To achieve the Department's environmental justice goals, the strategies pursued as a result of this planning process will be ongoing and sustainable, will be developed in partnership with the communities affected by environmental justice issues, and will involve the institutionalization of processes and policies to reduce the disparate impact of environmental burden on people of color and low income status.

#### Key Implementation Principles

- 1. Awareness and Sensitivity:** The department will ensure that all staff involved in environmental decision making are sensitive to the nature of and the cumulative environmental burden on the population affected by those decisions.
- 2. Public Participation:** The Department will continue to improve its efforts to put into place effective means for soliciting meaningful public input on environmental decision making.
- 3. Inclusiveness:** The Department will include all interested parties in the process of fashioning an environmental justice strategy.
- 4. Proactivity:** The Department will actively pursue resolutions to environmental justice disputes or arranging for the facilitation of those disputes between all of the interested parties.
- 5. Sustainability:** The environmental justice strategy devised in partnership by the Department and other stakeholders will include the means for ongoing sustainability of programs implemented pursuant to the strategy as well as systemic evaluation measures.

#### Implementation Steps

The Department has:

- Formed a statewide Interim Environmental Justice Advisory Committee that includes affected groups throughout the State.
- Identified geographical areas of environmental justice concern.
- Provided an environmental justice point of contact/clearinghouse within the Department to serve as a link between affected communities, industries and all levels of government.

- Developed plans to institutionalize within the Department's procedures, additional or more appropriate public process for rule makings, facility sitings or economic development incentive packages that affect environmental justice focus areas.
- Committed to the performance of milestones to integrate the Environmental Justice Strategic Plan throughout all of the Department's environmental programs.
- Developed plans to periodically evaluate the effectiveness of the Environmental Justice Strategic Plan and the Department's implementation of the Plan.

### **Future Implementation Steps**

During the upcoming months the Department will:

- Conduct workshops throughout the state to educate communities about environmental justice issues and their role as participants in environmental decision making.
- Conduct internal training of Department staff on environmental justice issues and processes with the goal of integration of those concepts into its day-to-day work.
- Before environmental decisions are made, actively facilitate the resolution of environmental justice disputes between communities and industries during the up-front siting process for new and expanded facilities.
- Institutionalize within the Department's procedures, additional or more appropriate public processes for rule making, facility sitings, or economic development incentive packages that affect impacted communities.
- Periodically evaluate the effectiveness of the Environmental Justice Strategic Plan and the Department's implementation of the Plan.



## Section **3** **IDEM's Public Involvement Activities**

IDEM pursued the involvement of citizens, groups, and other government entities as it developed this agreement. IDEM offices conducted many meetings with stakeholders to discuss goal development. These meetings included the regularly scheduled meetings of our agency's policy setting boards, such as the Water Pollution Control Board and the Clean Manufacturing Technology and Safe Materials Board. They also included meetings with other groups formed to deal with a more specific issue or program, such as the Hazardous Waste Compliance Advisory Group. Many managers and staff spent a significant amount of time discussing goals, objectives and indicators with stakeholders.

The Environmental Quality Services Council (EQSC) is IDEM's legislatively formed oversight body. IDEM communicates regularly with EQSC members regarding agency activities.

IDEM senior managers also made presentations to community groups, business seminars and other forums to offer a variety of customers an opportunity to participate in the development of Agency-Wide and Office Priorities. These presentations were well received and will continue.

Draft copies of this Agreement were distributed to interested stakeholders.

IDEM will continue to work to improve our public outreach and involvement efforts. IDEM managers will continue to describe the impact of the agreement for their audiences, and encourage businesses and local communities to work toward statewide goals and objectives. We will continue to update board members on progress toward goals in this agreement and the development of the next one. We will continue to increase the partnership between IDEM and US EPA Region 5 in communicating with and listening to the citizens of Indiana.



## Section

## 4

## Review/Assessment Process

The review and assessment process for this agreement and the performance partnership grant will provide a forum for meaningful, face-to-face communication between IDEM and US EPA Region 5. The process will:

- Measure and analyze the environmental and programmatic results;
- Recognize and reward success in achieving environmental results;
- Identify emerging issues, environmental trends and areas and strategies for improvement;
- Provide flexibility in both form and substance, as warranted by program performance;
- Seek to eliminate duplicative or unnecessary efforts and reporting;
- Provide an accountability mechanism for evaluating and maintaining national consistency, while allowing for differences among individual state programs;
- Respond with appropriate solutions, which may include redirecting goals and resources; obtaining federal assistance; or increasing federal oversight and involvement in the management of delegated programs; and
- Encourage IDEM to find innovative program implementation alternatives, as long as the desired result is achieved.

The success of this agreement relies on clear, constructive communication and the commitment of IDEM and US EPA Region 5 to work together to solve problems and improve the programs. If any differences on specific issues or problems arise, IDEM and US EPA Region 5 will move quickly to resolve them at the staff level or elevate the issue through the dispute resolution process described in Section 5: Dispute Resolution Process (on page 193).

**To facilitate frequent and open communication we will:**

**1. Hold Conference Calls Quarterly:** In order to share ideas, progress and plan program activities, conference calls will be held quarterly for each program. By September 15, 2001, IDEM and US EPA Region 5 will identify the managers responsible for convening the calls and developing the agendas. Both IDEM and US EPA Region 5 may contribute topics for the agenda. Less formal ongoing communication during the agreement period is encouraged.

**2. Hold Partnership Meetings Annually:** IDEM and US EPA Region 5 will meet annually to assess progress on the Environmental Performance Partnership Agreement. IDEM will conduct self-assessments twice per year and will provide EPA with update on all projects and performance measures. IDEM and US EPA Region 5 will work together to set the agenda and exchange appropriate materials for discussion, including areas for improvement, successes in implementation, progress toward the goals, objectives and outcomes in the agreement, review of core performance measures and other issues that will impact the agreement (i.e., new legislation or policies). After the meeting, notes will be prepared and distributed which highlight the issues discussed, including the next steps and any proposed amendments to this agreement. Meeting notes and materials will serve as documentation of progress under the agreement. Participants will include staff and managers responsible for achieving the objectives under the environmental/strategic goals. The meetings will include exit briefings for IDEM assistant commissioners or deputy commissioners, if requested.

**3. Review State-Federal Relationship Quarterly:** Each quarter during the agreement period, a conference call will be held between the senior IDEM manager and senior US EPA Region 5 manager responsible for monitoring and implementing the EnPPA in each agency. This conference call will serve as a checkpoint for elevating state-federal relationship issues, celebrating successes, identifying barriers, and reaffirming the agreement's validity for both agencies.

**4. Hold Midterm Partnership Meeting:** Senior staff from IDEM and US EPA Region 5 will hold a Partnership Meeting in October 2002.

This Midterm Partnership meeting will:

- assess IDEM and US EPA Region 5's performance against the objectives, indicators and core performance measures in this agreement;
- analyze current program strengths and areas for improvement;
- identify emerging issues and environmental trends; and
- suggest any specific actions, approaches or suggestions for IDEM and US EPA Region 5 to improve progress under the next agreement.

**5. Self-assessment:** IDEM and EPA Region 5 will provide a written self-assessment by September 30, 2002 and September 30, 2003.

### Amendments

During the agreement period, it may be necessary to amend the agreement to respond to legislative mandates, emerging issues, new priorities or other unforeseen issues. IDEM's Office of Planning and Assessment will submit proposed amendments to US EPA Region 5 as needed, but no more often than once each quarter. The Office of the Regional Administrator will be responsible for coordinating US EPA Region 5's review and approval of those amendments.

### Other Reporting Relationships

During the agreement period, IDEM will provide information and reports to specific US EPA Region 5 program areas as outlined in annual guidance. **The drinking water annual program guidance or Annual Resource Deployment Plan (ARDP) end of year report is due to Region 5 by October 1<sup>st</sup> of each year.** US EPA Region 5 will conduct an annual evaluation of IDEM program performance pursuant to grant regulations and guidance. IDEM will continue to operate a US EPA Region 5 quality assurance program and submit timely and accurate data into existing regional/national databases.

The following tables show the relationships between the calendar year, the federal fiscal year, the state fiscal year and the time frames for the conference calls, partnership meetings, self-assessments and in "Indiana's Annual State of the Environment Report", which have been described above:

### Fiscal Years

Calendar Year	Federal Fiscal Year	State Fiscal Year
July - September, 2001	FFY 2001	SFY 2002
October - December, 2001	FFY 2002	
January - March, 2002		
April- June, 2002		
July- September, 2002	FFY 2003	SFY 2003
October - December, 2002		
January - March, 2003		
April- June 2003		SFY 2004
July - September, 2003		

- Table 3: Fiscal Years

### Time Frames

Calendar Year	Conference Calls	Partnership Meetings	Self Assessment	Indiana's Annual State of the Environment Report
July - September, 2001				
October - December, 2001			*	
January - March, 2002	X			
April- June, 2002		X		X
July-September, 2002	X		**	
October - December, 2002				
January - March, 2003	X			
April- June 2003		X		X
July - September, 2003			***	

- Table 4: Time Frames

\* Final Self-Assessments for 1999-2001 Environmental Performance Partnership Agreement.

\*\* Mid-Term Self-Assessment for 2001-2003 Environmental Performance Partnership Agreement.

\*\*\* Final Self-Assessments for 2001-2003 Environmental Performance Partnership Agreement.



## Section

**5 Dispute Resolution Process**

IDEM and US EPA Region 5 will use the following agreed-upon dispute resolution process to handle the conflicts that may arise as we implement our environmental programs. We will treat the resolution process as an opportunity to improve our joint efforts and not as an indication of failure. For the purpose of this agreement, the following definitions will apply.

**Dispute** - any disagreement over an issue that prevents a matter from going forward.

**Resolution process** - a process whereby the parties move from disagreement to agreement over an issue.

## **I. Informal Dispute Resolution Guiding Principles**

IDEM and US EPA Region 5 will ensure those programs:

- Recognize conflict as a normal part of the state/federal relationship.
- Approach disagreement as a mutual problem requiring efforts from both agencies to resolve.
- Approach the discussion as an opportunity to improve decision-making through joint efforts.
- Aim for resolution at the staff level, while keeping management informed.
- Seriously consider all issues raised, but address them in a prioritized manner to ensure that sufficient time is allocated to the most significant issues.
- Promptly disclose underlying assumptions, frames of reference and other driving forces.
- Clearly differentiate positions and check understanding of content and process with all appropriate or affected parties to ensure acceptance by all stakeholders.
- Document discussions to minimize future misunderstandings.
- Pay attention to time frames and/or deadlines and escalate quickly when necessary.



## **II. Formal Conflict Resolution**

There are several formalized programmatic conflict resolution procedures that need to be invoked if the informal route has failed to resolve all issues. 40 CFR 31.70 outlines the formal grant dispute procedures. There is also a national pollutant discharge elimination system (NPDES) conflict resolution procedure. In addition, the Superfund program sponsors an alternate dispute resolution contract that provides neutral third parties to facilitate conflict resolution for projects accepted into the program. These are all time consuming and should be reserved for the most contentious issues. For less contentious matters, we will use the following procedures:

- 1. Principle:** All disputes should be resolved at the front line or staff level.
- 2. Time frame:** Generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. If unresolved at the end of two weeks, the issue should be raised to the next level of each organization.
- 3. Escalation:** When there is no resolution and the two weeks have passed, there should be comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

See Dispute Resolution Model in Appendix C (on page 205).



## Section **6 Conclusion**

The 2001-2003 Environmental Performance Partnership Agreement was developed to guide and frame our course, to provide common goals and opportunities for collaborative efforts, and to promote the most effective allocation of resources. This agreement will help us foster a stronger working relationship and strengthen our ability to address and resolve the complex environmental challenges now facing us. Ultimately, this shared vision will help us reach our long-term goal of a healthier, cleaner environment.



## Section **7 Agreement**

This agreement is hereby entered into on this day of November 7, 2001 and remains in effect until June 30, 2003, unless amended by mutual consent.

**For the State of Indiana:**

\_\_\_\_\_  
Lori F. Kaplan  
Commissioner  
Indiana Department of Environmental Management

\_\_\_\_\_  
Date

**For the U.S. Environmental Protection Agency:**

\_\_\_\_\_  
Thomas V. Skinner  
Regional Administrator  
Region 5, United States Environmental Protection Agency

\_\_\_\_\_  
Date



# Appendix **A** Framework for this Agreement

IDEM has adopted a framework for planning to ensure a consistent vocabulary while implementing this agreement. The framework is consistent with the national framework for core performance measures developed jointly by U.S. EPA and the states. The goals described herein are long-term visions of what we are trying to achieve. Objectives and outcomes are targets which we strive to achieve in a specific, measurable, achievable, realistic, and timely (SMART) manner. Program priorities are specific IDEM activities that we undertake to achieve our environmental or strategic objectives and outcomes

## **Environmental/Strategic Goals**

IDEM's Environmental/Strategic Goals were developed by an agency-wide strategic planning effort in 1994 and have been reviewed and updated for this Agreement

Environmental goals focus on desired improvements in the state of the environment, measured through ambient air, land and water quality. Strategic goals focus on improved environmental management practices, geographic priorities, internal IDEM management and other issues of importance. For example, our strategic goal for drinking water is "Ensure Safe Drinking Water".

## **Environmental/Strategic Objectives**

IDEM's Environmental/Strategic Objectives were developed for the 2001-2003 Environmental Performance Partnership Agreement and have been reviewed and updated for this Agreement

Environmental objectives define a specific and measurable result that is achievable and realistic within a specified time period, related to the desired ambient air, land, and water quality. For example, an environmental objective for improving air quality is "By the year 2007, citizens in Northwest Indiana will have air that meets the 0.12 part per million National Ambient Air Quality Standards (NAAQS) for ozone."

Strategic objectives define a specific and measurable result that is achievable within a specific time period, but these objectives are related to a strategic goal. For example, an IDEM strategic objective is "IDEM will track environmental progress through indicators summarized in "Indiana's Annual State of the Environment Report."

## **Outcomes**

An outcome is a specific and measurable result. An outcome may be a change in behavior (compliance rates) or a change in the quality of the environment (levels of emissions). Outcomes allow us to evaluate the effectiveness of IDEM's activities.

## **Program Priorities**

Program priorities are specific IDEM activities that we undertake to achieve our environmental or strategic objectives and outcomes during the term of this agreement.

**The following table summarizes the four levels in IDEM's planning framework:**

- Table 5: Framework for Planning

<b>Framework for Planning</b>		
<b>Endpoint</b>	<b>Characteristics</b>	<b>Measures</b>
Goals	<ul style="list-style-type: none"> <li>▪ Long-term.</li> <li>▪ Not constrained by resources.</li> <li>▪ Ultimate desired result.</li> <li>▪ Quantitative or qualitative target.</li> <li>▪ Environmental or strategic.</li> <li>▪ No specific time frame.</li> </ul>	<b>State of the Environment</b> Long-term improvements in the quality of Indiana's air, land and water.
Objectives	<ul style="list-style-type: none"> <li>▪ Clear numerical target</li> <li>▪ Strategic or environmental.</li> <li>▪ Includes a time frame and baseline.</li> <li>▪ Linked to long-term goal.</li> <li>▪ Achievable with anticipated resources.</li> <li>▪ Time frame of at least 5 to 10 years</li> </ul>	<b>Core Environmental Indicators</b> Examples: <ul style="list-style-type: none"> <li>▪ Trends in ambient air quality</li> <li>▪ Number and percent of assessed river miles that have water quality supporting designated beneficial uses.</li> </ul>
Outcomes	<ul style="list-style-type: none"> <li>▪ Desired changes in emission levels, compliance rates or activities of pollution sources.</li> <li>▪ Linked to the objectives.</li> <li>▪ Clear target that includes a timeframe, a numerical target, and a baseline.</li> <li>▪ Achievable with anticipated resources.</li> <li>▪ Time frame of 2 to 5 years.</li> </ul>	<b>Core Program Outcome Measures</b> Examples: <ul style="list-style-type: none"> <li>▪ Percent of facilities in compliance</li> <li>▪ Emission levels of air pollutants. Percent of Underground Storage Tanks (USTs) meeting requirements.</li> </ul>
Priorities	<ul style="list-style-type: none"> <li>▪ What IDEM does.</li> <li>▪ Linked to outcome.</li> <li>▪ Includes permitting, enforcement actions, inspections, and education/outreach activities.</li> <li>▪ Measurable targets for program performance, such as "Issue all permits on time"</li> <li>▪ One-year time frame.</li> </ul>	<b>Measures of Success</b> Examples: <ul style="list-style-type: none"> <li>▪ Percentage of permits issued on time.</li> <li>▪ Number of inspections.</li> </ul>



Appendix

**B**

# **IDEM / EPA Region 5 Org. Charts**

**Organizational Charts are available at:**

Indiana Department of Environmental Management:

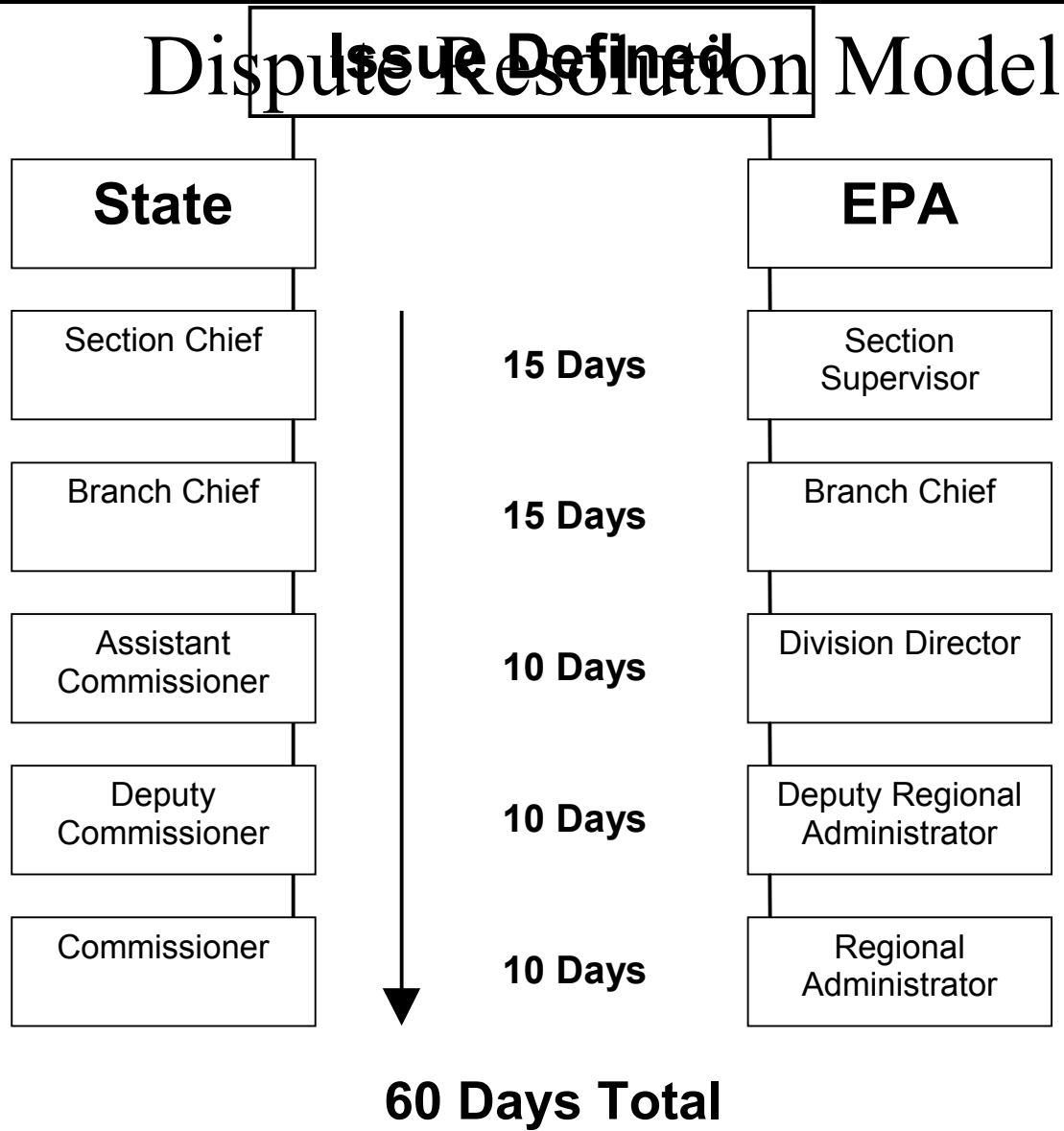
<http://www.IN.gov/idem/orgchart.html>

EPA Region 5:

<http://www.epa.gov/region5/orgchart.htm>



Appendix

**C****Dispute Resolution Model**

- Figure 1: Dispute Resolution Model



## Appendix

**D Acronym List**

AA	Administrative Assistant
AEL	Active Exceptions List
AG	Attorney General
AHERA	Asbestos Hazard Emergency Response Act
AIRS	Aerometric Information Retrieval System
AL	Action Level
ANSI	American National Standards Institute
APTI	Air Pollution Training Institute
ARB	Air Resources Board (Grissom)
ASQC	American Society for Quality Control
AWMA	Air and Waste Management Association
BAA	Broad Agency Announcement
C/E	Compliance and Enforcement
CA	Corrective Action
CAATS	Computer Assisted Approval and Tracking System
CAM	Compliance Assurance Monitoring
CAP	Corrective Action Plan, Community Assistance Program, or Compliance Advisory Panel
CD	Compact Disk
CE	Compliance and Enforcement
CEI	Compliance Evaluation Inspection
CEMS	Compliance/Enforcement Management System, Continuous Emissions Monitoring Systems
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act (1980)
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CFR	Code of Federal Regulations
CITES	Central Indiana Technical and Environmental Societies
CMTB	Clean Manufacturing Technology Board
CMTI	Clean Manufacturing Technology and Safe Materials Institute
COMS	Continuous Emissions Monitoring Systems
COP	Current Operating Procedure
CPM	Core Performance Measure
CSO	Combined Sewer Overflow
CTAP	Compliance and Technical Assistance Program (IDEM)
DC	District of Columbia
DNR	Indiana Department of Natural Resources
DOD	U.S. Department of Defense
DWB	Drinking Water Branch (IDEM)
DWSRF	Drinking Water State Revolving Fund
EMI	Environmental Management Institute
EMPACT	Environmental Monitoring for Public Access and Community Tracking
EMS	Emergency Response System, Environmental Management System
EnPPA	Environmental Performance Partnership Agreement
EPA	U.S. Environmental Protection Agency
EQSC	Environmental Quality Service Council
ERAG	Ecological Risk Assessment Guidance

ESRI	Environmental Systems Research Institute
FCA	Fish Consumption Advisory
FESOP	Federally Enforceable State Operating Permit
FFY	Federal Fiscal Year
FSR	Financial Status Report
FY	Fiscal Year
GIS	Geographic Information System
GLPPR	Great Lakes Pollution Prevention Roundtable
GPRA	Government Performance and Results Act
GPS	Global Positioning System
HAP	Hazardous Air Pollutants
HD	Health Department
HDDS	Heavy Duty Diesel Settlement
HHW	Household Hazardous Waste
HPV	High Priority Violation
HR	Human Resources
HRS	Hazard Ranking System
I & M	Vehicle Inspection and Maintenance
I/M	Inspection/Maintenance
IC	Indiana Code
IDEM	Indiana Department of Environmental Management
IEHA	Indiana Environmental Health Association
IEI	Indiana Environmental Institute
IFES	Indiana Forum Environmental Safety
IIOA	Indiana Industrial Operators Association
IKE	Improving Kids' Environment
IMA	Indiana Manufacturers' Association
IN	Indiana
IOC	Inorganic Chemicals
IPM	Integrated Pest Management
ISM	Indiana Scoring Model
ISO	International Standard Organization
I-STEPS	Indiana State Emissions Processing System
IT	Information Technology
LADCO	Lake Michigan Air Directors Consortium
LEAP	Learning and Environmental Awareness Partnership
LEPC	Local Emergency Planning Committee
LQG	Large Quantity Generator
LSA	Legislative Services Agency
LUST	Leaking Underground Storage Tank
MACS	Media and Communications Services (IDEM)
MACT	Maximum Achievable Control Technologies
MCL	Maximum Contaminant Level
METS	Multimedia Enforcement Tracking System
MM	Multimedia
MOA	Memorandum of Agreement
MOS	Measure of Success
MOU	Memorandum of Understanding
N/A	Not Applicable
NAAQS	National Ambient Air Quality Standards
NEPPS	National Environmental Performance Partnership System
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NIRPC	Northwest Indiana Regional Plan Commission
NOx	Nitrogen Oxides
NPD	Nonrule Policy Document
NPDES	National Pollution Discharge Elimination System

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NPL	National Priorities List
NPPR	National Pollution Prevention Roundtable
NPS	Nonpoint Source
NRC	National Recycling Coalition
NW	Northwest
O&M	Operations and Maintenance
OAQ	Office of Air Quality (IDEM)
OBDII	On-Board Diagnostic Testing
OE	Office of Enforcement (IDEM)
OECA	Office of Enforcement and Compliance Assurance
OLC	Office of Legal Council (IDEM)
OLQ	Office of Land Quality (IDEM)
OMBA	Office of Management, Budget and Administration (IDEM)
OPA	Oil Pollution Act
OPPTA	Office of Pollution Prevention and Technical Assistance (IDEM)
OSHA	Occupational Safety and Health Administration
OVC	Office of Voluntary Compliance (IDEM)
OWQ	Office of Water Quality (IDEM)
P2	Pollution Prevention
P4P2	Partners for Pollution Prevention
PA/VS	Preliminary Assessment / Visual Site Investigation
PBT	Persistent Bioaccumulative Toxics
PCB	Polychlorinated Biphenyls
PDF	Portable, Downloadable File
PM2.5	Particulate Matter 2.5 millimeters in diameter
POTW	Publicly Owned Treatment Works
PPG	Performance Partnership Grant
PSD	Prevention of Significant Deterioration
PWS	Public Water System, Public Water Supply
PWSS	Public Water Supply System
QA	Quality Assurance
QAPP	Quality Assurance Program Plan
QMP	Quality Management Plan
Rads	Radionuclide
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Information System
RFA	RCRA Facility Assessment
RFI	RCRA Facility Investigation
RI	Reconnaissance Inspections
RISC	Risk Integrated System of Closure
RP	Responsible Party
SDWIS	Safe Drinking Water Information System
SEM	Senior Environmental Manager
SFY	State Fiscal Year
SGP	Strategic Goals Program
SI	Site Inspection
SIP	State Implementation Plan
SNC	Significant Noncompliance
SO2	Sulfur Dioxide
SOC	Synthetic Organic Compounds
SPA	State Program Approval
SPD	State Personnel Department (Indiana)
SSO	Sanitary Sewer Overflow
SSOA	Source Specific Operating Agreement
STARS	Semi-annual Performance Measures Report

SWMD	Solid Waste Management District
SWQMS	Surface Water Quality Monitoring Strategy
SWTR	Surface Water Treatment Rule
TMDL	Total Maximum Daily Load
TRI	Toxic Release Inventory
TSD	Treatment, Storage and Disposal
TT	Treatment Technique
TTHM	Total Trihalomethane
TVOP	Title 5 Operating Permits
UIC	Underground Injection Control
ULCERS	Underground Leaking, Community Right to Know and Emergency Response System
US EPA	U.S. Environmental Protection Agency
USDA	U.S. Department of Agriculture
USGS	U.S. Geological Survey
UST	Underground Storage Tank
UWA	Unified Watershed Assessment
VOC	Volatile Organic Compounds
VRP	Voluntary Remediation Program (IDEM)
WPCB	Water Pollution Control Board
WQM	Water Quality Management
WRS	Watershed Restoration Strategy
Y2K	Year 2000



## Addendum

**A Office Of Water Quality****Funding Sources**

- 1) ***IDEM will reach agreement with the State Budget Agency on the use of DW SRF for program administration. The Intended Use Plan will be modified to reflect the use of the set-asides by the program.***

By: September 30, 2001

- 2) ***IDEM will determine, based on number 1) above, whether any federal PPG funds will be transferred to the Drinking Water Program.***

By: October 31, 2001

- 3) ***IDEM will evaluate funding needs and possible funding sources in addition to numbers 1) and 2) above and make recommendations for any additional funding sources.***

By: December 31, 2001

- 4) ***IDEM will provide a report on the status of items 1) – 3) above.***

Quarterly

**Enhancements to Current Drinking Water Program**

- 5) ***Through use of additional resources, the Drinking Water Program will enhance current efforts in the following areas:***

- a) Increase the number of sanitary surveys performed
- b) Improve public water supply monitoring and reporting compliance with a focus on small systems
- c) Improve the ability of systems to meet the requirements of the SDWA by improving implementation of Indiana's Capacity Development Strategy for existing systems
- d) Increase the number of wellhead protection plans approved
- e) Improve IDEM's capability to implement new federal rules promulgated under the 1996 Amendments to the Safe Drinking Water Act
- f) IDEM will provide a report on the status of items a) - e) above.

Semi-annually

- 6) ***To accomplish these tasks, IDEM plans to add additional staff to the Drinking Water Program, utilize an outside contractor and make use of the State Department of Health's laboratory. Specifically, IDEM will perform the following activities to address the above noted concerns:***

a) Increase the number of Sanitary Surveys Performed

- (1) IDEM will pursue hiring additional inspectors to perform sanitary surveys, provide follow up at systems with MCL or other violations, provide compliance assistance and respond to citizens concerns.
- (2) As part of performing the field data collection work associated with source water assessments, IDEM's contractor will be performing sanitary surveys at transients systems using ground water.

Sanitary surveys under this contract should begin in August of 2001, and they should be completed within approximately 2 years.

- (3) If deficiencies are noted by the contractor, the systems will be prioritized for follow up by IDEM staff.
- (4) IDEM has prioritized all surface water systems for sanitary surveys.  
Over the next 2 years.

b) Improve public water supply monitoring and reporting compliance

- (1) IDEM will work cooperatively with the State Department of Health (SDH) laboratory to provide analysis of contaminants under the Total Coliform Rule and Nitrate Rule for all systems serving a population of 100 or less at no cost to the system.
- (2) Sample bottles will be mailed to each system. The system will collect the sample and return it to ISDH. The results of the samples will be delivered to IDEM electronically.
- (3) Systems that fail to monitor and report under this new approach will be referred to our Office of Enforcement for appropriate follow up.

c) Implement Indiana's Capacity Development Strategy for existing systems

- (1) IDEM will enhance our current capacity development efforts by hiring additional staff and consolidating existing staff to form a new Capacity Development Section. This new section will have primary responsibility for implementing the existing system strategy as well as capacity development for new systems.

d) Increase the number of wellhead protection plans approved

- (1) IDEM will hire a contractor(s) to perform wellhead plan reviews for the agency. By using a contractor, we anticipate that approximately 250 plans can be reviewed and a final decision issued each year.
- (2) IDEM will pursue the addition of staff (or the transfer of existing staff from other program areas) to assist in the Wellhead Protection Program. The staff will oversee the work of the contractor and provide assistance to systems, especially small systems, with the implementation of their wellhead protection plan.

e) Implementation of the Safe Drinking Water Act

- (1) IDEM will pursue creation of a rule development and implementation specialist. This position would coordinate the incorporation of federal rules into Indiana rules to maintain primacy. The position would analyze each rule for its impacts on the State's program and systems. The position would then develop a strategy for effective and efficient rule implementation by the State.
- (2) By completing the activities outlined in a), b) and c) above, some of the existing staff resources will become available to perform other activities. These staff will

be shifted to implementation of new rules including the surface water treatment rules (IESWTR, Filter backwash, LT1), the Disinfection Byproduct Rule, and the Public Notice Rule.

- (3) IDEM will use the Annual Resource Deployment Plan to describe the specific commitment of resources to the implementation of individual rules.



# **Addendum B Comments On The Federal Role in the Indiana DEM SFY 2002-03 EnPPA**

## **Office of Land Quality**

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### **B. OLQ - Office-wide Priorities, 2) RCRA Corrective Action**

#### **Meet CA/GPRA commitments**

The Region will share its Regional Corrective Action Project Transition Strategy with IDEM and discuss the details and negotiate a final strategy.

The Region will work with IDEM to provide assistance in the State's development of its multi-year strategy to achieve all GPRA permitting requirements through 2005.

The Region will work with IDEM to assist in its efforts to include Environmental Justice considerations into the RCRA permitting process and especially in use of risk based reviews.

### **C. OLQ - Branch Specific Priorities, 1) Remediation Branch , a) Site Assessment and Investigation, (7) NW Indiana Remedial Action Plan (RAP)**

Region 5 will work with stakeholders towards restoring native habitat at six Federal lead sites in northwest Indiana that, after completing their corrective action responsibilities, have potential for using their property by restoring the land to native habitat.

### **C. OLQ-Branch Specific Priorities, 2) Permits Branch, a) Hazardous Waste Permitting**

The Region's Corrective Action Section (Permits) has a number of projects at which corrective action activities are currently managed jointly by Region 5 and IDEM. This may include technical assistance and document review. The Region is developing transition plans for some of these projects which may be transferred to IDEM in the near future. Until such time, the Region will continue joint efforts with IDEM.

During SFY 2002-03, the Region is planning to issue federal Operating Permits to ESSROC and General Electric.

### **C. OLQ-Branch Specific Priorities, 3) Compliance Branch, b) UST Inspections**

The Region will provide training through the WPTD Training Institute as available particularly classes in field sampling ecological risk.

**C. OLQ-Branch Specific Priorities,**  
**3) Compliance Branch,**  
**c) Technical Compliance Inspections**

The Region will conduct Compliance Evaluation Inspections (CEI) at facilities handling hazardous waste which meet the following criteria: (1) statutory mandate : two installations which are owned and/or operated by either the State or a local government as described in the Solid Waste Disposal Act (SWDA) Section 3007(d) and three Federal facilities as described in SWDA Section 3007(c); (2) two treatment, storage or disposal facilities receiving CERCLA waste from off-site locations under SWDA Section 3007(e); (3) three Boiler and Industrial Furnaces; (4) six large quantity generators of hazardous wastes in U.S. EPA's national and/or Regional priority sectors, such as waste derived from fertilizers, foundries, coating and electroplating operations and organic chemicals; (5) requests fro IDEM; and (6) installations subject to open Federal enforcement either judicial and/or administrative decrees/orders.

The Region will conduct joint CEI's with IDEM at three large quantity generators (foundry sector) and three TSDs receiving hazardous waste from off-site locations. IDEM will take the lead in conducting the joint inspections.

The Region will refer hazardous waste related complaints received from Indiana citizens to IDEM for follow-up action.

**C. OLQ - Branch Specific Priorities,**  
**3) Compliance Branch,**  
**i) PCB Inspection Program**

Oversight for Toxics Substances Control Act (TSCA) PCB inspections will be done by Region 5's Pesticides and Toxics Enforcement Section. The Region will provide the State with the proper forms, including the TSCA Notice of Inspection and TSCA Confidentially Notice, to issue at inspections and include in inspection reports. The Region will assist the State in targeting facilities for a "neutral inspection scheme" consistent with U.S. EPA Headquarters guidance. In addition to facilities from the scheme list, the Region will provide IDEM with potential facilities from tips and complaints and those to be included in multi-media inspections.

After the State conducts an inspection and completes an inspection report, the Region inputs data into the FIFRA/TSCA Tracking System. After reviewing inspection reports the Region may make requests for clarification or rewording to assure all violations are adequately explained. The Region will then issue the appropriate enforcement response. Only facilities not in compliance are notified. Depending on the circumstances the facility receives either a Notice of Noncompliance or a Civil Administrative Action. The Region sends copies of these to IDEM and also periodically updates the State on all facilities found in compliance.

The Region will provide technical assistance, rule interpretation and training to the State.

## Office of Water Quality

### **A. OWQ - Agency-Wide Priorities,**

#### **1) Promote Watershed Approach**

The Region will work jointly with the State to develop the Total Maximum Daily Loads (TMDL) strategy that is consistent with the two year TMDL schedule and will review and either approve or disapprove the State TMDL submission.

The Region will work with the State to make possible the timely assumption of the Clean Water Act Section 404 program.

### **A. OWQ - Agency-Wide Priorities,**

#### **7) Retain Primacy for Safe Drinking Water Act Program**

U.S. EPA's headquarters will continue to develop regulations and guidance to implement the 1996 amendments to the Safe Drinking Water Act (SDWA). The Region 5 Ground Water and Drinking Water Branch (GWDWB) will assure that input from the State is requested and that IDEM's comments/issues are raised and presented to the national regulation development workgroups for discussion to help assure that regulations and guidance are appropriate and workable.

Region 5 GWDWB will review and comment on proposed State legislation and regulations to ensure consistency with Federal statutory requirements.

Region 5 GWDWB will provide training for IDEM staff on all new drinking water regulations within six months of final rule promulgation.

Region 5 GWDWB will support IDEM's efforts to expand State program resources in order to ensure drinking water safety.

### **A. OWQ - Agency-Wide Priorities,**

#### **7) Retain Primacy for Safe Drinking Water Act Program,**

##### **d) Implement Capacity Development for 50 community systems**

The Region 5 GWDWB will inform the State in writing of the annual capacity development (CD) reporting requirements and other CD reporting requirements (i.e. Report to the Governor, etc.) As required under the SDWA, as amended. The Region will work closely with IDEM to assure report are submitted on time and that they met the requirements of the SDWA, Section 1420 (a)-(c). The Region will inform IDEM of national and regional CD related activities (i.e. training, workshops, etc.).

### **A. OWQ - Agency-Wide Priorities,**

#### **7) Retain Primacy for Safe Drinking Water Act Program,**

##### **e) 3600 PWS Completed Source Water Assessment Reviews**

Region 5 GWDWB will support assessment and protection programs by State and local agencies by: a) developing partnerships with other U.S. EPA programs and other Federal agencies to assist States with assessments and protection; b) developing assessment and protection tools for use by States and locals; and c) by using outreach to get other parties to support source water protection.

### **B. OWQ-Office-Wide Priorities,**

#### **1) Surface Water Quality Monitoring Strategy Implementation**

The Region will review and assess State monitoring programs (the first meeting to be held before December 31, 2001 and the completed review and report by December 31, 2002).

The Region will provide technical support and guidance as needed. Assistance will be provided through the Midwest Biological Institute.

The Region will assist with field work and seek additional funds from U.S. EPA headquarters to assist the State in developing criteria.

**B. OWQ-Office-Wide Priorities,**

**2) Surface Water Quality Monitoring Strategy**

The Region will provide guidance on developing monitoring strategies (Elements of an Adequate State Monitoring Program) and take an active part in assisting IDEM, as requested.

The Region will provide site-specific analyses or technical support, if requested, on priority places and waterways.

The Region will train, if requested, IDEM to use information technology-based decision support systems.

The Region will network with Regional partners to adopt a set of contextual protocols that will make water quality information posted on the Web more cohesive and coherent for public use.

The Region will make Great Lakes Initiative Clearinghouse available via the Internet.

**B. OWQ-Office-Wide Priorities,**

**5) Watershed Restoration Strategies and Unified watershed Assessment**

The Region will provide funding for State projects supporting nutrient criteria development up to the amount available from U.S. EPA headquarters and facilitate nutrient RTAG.

**B. OWQ-Office-Wide Priorities,**

**6) Issue and Management of Water Quality Federal Grants**

The Region will provide outreach to municipalities and developers on storm water Phase II requirements.

The Region will ensure emphasis on measurable environmental improvements in the 319/Non-point Source program and will provide assistance to the State to ensure the annual report focuses on accomplishments.

**B. OWQ-Office-Wide Priorities,**

**9) Database Management**

The Region 5 GWDWB will ensure the accuracy and completeness of SDWIS/FED data submissions and provide technical assistance and guidance on data management issues as resources allow. In addition, the Region will keep IDEM up-to-date on new/revised reporting requirements.

The Region will provide assistance in getting STORET either operational or linked to the State database.

The Region will provide technical and program assistance to the State on integrating various levels of NPS information needs with State monitoring needs.



**B. OWQ-Office-Wide Priorities,  
13) New Permits Issued on time,  
b) Wastewater Construction Permits**

The Region will review State rule changes to implement storm water phase II requirements.

**B. OWQ-Office-Wide Priorities,  
14) Implement existing rules under the Safe Drinking Water Act,  
B) Introduce and include P2 awareness into the Operator Certification Program**

Region 5 GWDWB will inform IDEM of the annual operator certification reporting requirements as required under the 1996 SDWA amendments. Region 5 will work closely with the State to assure reports are submitted on time and that they meet Federal requirements. Region5 will inform IDEM of national and regional guidance and related activities. Region 5 will review the annual report as well as the Operator Certification Expense Reimbursement Grant Report.

## Office of Air Quality

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### **B. OAQ-Office-Wide Priorities,**

#### **1) Prepare for implementation of the NOX SIP call,**

##### **a) Complete submission of fully adopted NOX rule, and initial allocations to U.S. EPA.**

The Region will take final rule making action on NOX submittal by the September 30, 2001.

### **D. OAQ-Branch Specific Priorities,**

#### **1) Permits Branch,**

##### **a) Issue all New Source Review decisions**

The Region will provide review and comments in a timely manner.

### **D. OAQ-Branch Specific Priorities,**

#### **1) Permits Branch,**

##### **c) Issue all but 40 (5%) of the Title V permits with application dates prior to December 31, 2000 before June 30, 2002.**

The Region will provide review and comments in a timely manner.

### **D. OAQ-Branch Specific Priorities,**

#### **1) Permits Branch,**

##### **f) Make all necessary revisions to Title V rules and program to receive full Federal approval and to comply with HB 1343.**

The Region commits to work with IDEM to review the rules and provide a timely response so that IDEM can meet the deadline.

### **D. OAQ-Branch Specific Priorities,**

#### **1) Permits Branch,**

##### **h) Public participation goals/activities**

The Region will work with IDEM and EPA offices to establish and implement citizens New Source Review training.

### **D. OAQ-Branch Specific Priorities,**

#### **1) Permits Branch,**

##### **k) Evaluate further opportunities to establish general permits or permits by rule,**

If requested, the Region commits to work with IDEM to evaluate innovative approaches to meet deadlines.

### **D. OAQ-Branch Specific Priorities,**

#### **1) Permits Branch,**

##### **l) Establish schedule for opportunities identified to establish general permits or by rule and implement.**

If requested, the Region commits to work with IDEM to evaluate innovative approaches to meet deadlines.

**D. OAQ- Branch Specific Priorities,  
2) Compliance Branch**

The Region will: provide IDEM with all inspection/compliance determination tools developed by U.S. EPA , for example the Off-Site Inspection Checklist; participate in bimonthly enforcement prioritization conference calls; conduct joint compliance inspections with IDEM staff; forward citizen complaints to IDEM and work cooperatively to resolve them; provide IDEM with training and support for the maintenance of the AIRS data base; prepare written regulatory applicability determinations; and provide guidance to IDEM personnel by telephone and e-mail.

**D. OAQ- Branch Specific Priorities,  
2) Compliance Branch,  
c) Implement the draft EPA Compliance Monitoring Strategy (CMS) for inspection and compliance evaluations.  
(1) Develop a CMS plan with Region 5.**

The Region will work with IDEM to ensure the development of the CMS plan.

**D. OAQ- Branch Specific Priorities,  
2) Compliance Branch,  
f) Develop coordinated compliance program with OLQ focusing on sources subject to NESHAPS that contain leak detection requirements.**

The Region will provide assistance to IDEM as requested.

**D. OAQ- Branch Specific Priorities,  
2) Compliance Branch,  
i) Styrene compliance evaluation 326 IAC 20-50,  
j) Approve protocols, quality assure and validate 85% of Compliance tests focusing on Title V ,**

The Region will provide assistance and respond to questions as requested.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
a) Continue to operate and review all ambient networks to track National Ambient Air Quality Standards compliance for all criteria pollutants.  
(1) Track monthly valid date return.**

The Region will perform NAMS/SLAMS/AIRS reviews throughout the year and conduct: Technical system and performance audits and precision and accuracy data reviews.

The Region will continue to work with IDEM to implement the Regional Air Monitoring Strategy in conjunction with the remaining Region 5 States and the Lake Michigan Air Consortium.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
a) Continue to operate and review all ambient networks to track National Ambient Air Quality Standards compliance for all criteria pollutants.  
(2) Achieve 90% valid data return for intermittent parameters.**

The Region will issue Quarterly Data Completeness Reports.

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**a) Continue to operate and review all ambient networks to track National Ambient Air Quality Standards compliance for all criteria pollutants.**

**(3) Provide final, quality assured ozone data after the close of the ozone season.**

The Region will review and validate ozone data (May - September).

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**a) Continue to operate and review all ambient networks to track National Ambient Air Quality Standards compliance for all criteria pollutants.**

**(4) Conduct annual network review in conjunction with Lake Michigan Air Directors Consortium Regional Planning Organization.**

The Region will review the network and provide comments.

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**b) Continue Indiana Air Toxics Monitoring Program.**

The Region will assess and review existing air toxics networks and provide assistance to characterize, assess and address air toxics risks.

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**b) Continue Indiana Air Toxics Monitoring Program.**

**(2) Track monthly valid data return for toxics site and meet 90%.**

The Region will inventory air toxics data and enable submission of data to AIRS and also track concentrations and monitoring frequency.

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**b) Continue Indiana Air Toxics Monitoring Program.**

**(3) After consultation with Air Toxics Advisory Group, finalize TO-15 analyte list, acquire standard, and begin analyzing the canister samples for those analytes.**

The Region will provide assistance with methodology.

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**b) Continue Indiana Air Toxics Monitoring Program.**

**(4) Implement enhancements at Indianapolis - Washington Park site to become a supersite, in accordance with the National Air Toxics Monitoring Program Grant.**

The Region will track and provide necessary assistance and conduct Technical System Audits.

**D. OAQ- Branch Specific Priorities,**

**3) Ambient Air Monitoring Branch,**

**b) Continue Indiana Air Toxics Monitoring Program.**

**(5) Maintain up to date information on Toxwatch website.**

The Region will create and monitor web page which displays maps of Region, State and local air toxics monitoring locations.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
c) Establish PM-2.5 Speciation Monitoring Network.  
(1) Research alternative continuous methodologies.**

The Region will coordinate laboratory analysis activities for the lab which does the speciation analysis for their two filter based speciation monitors.

The Region will provide assistance to complete the deployment of continuous mass PM-2.5 monitors.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
c) Establish PM-2.5 Speciation Monitoring Network. (2) - (5) monitoring activities**

The Region will provide assistance as needed and appropriate.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
c) Establish PM-2.5 Speciation Monitoring Network,  
d) Conduct data analysis on PM-2.5 data**

The Region will provide assistance as needed and appropriate.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
c) Establish PM-2.5 Speciation Monitoring Network,  
e) Conduct Visibility Monitoring**

The region will provide assistance as needed and appropriate.

**D. OAQ- Branch Specific Priorities,  
3) Ambient Air Monitoring Branch,  
c) Establish PM-2.5 Speciation Monitoring Network,  
f) Conduct Special Purpose Monitoring for complaints or source problems**

The region will provide assistance as needed and appropriate.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch**

The Region will complete both NSPS and MACT regulatory and applicability determinations for Indiana sources.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch,  
a) Inspection/Maintenance**

The Region will review rules and take rule making action when rules submitted.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch,  
b) Criteria Pollutants**

The Region will provide assistance as needed and appropriate and carry out necessary rule making activities.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch,  
b) Criteria Pollutants,  
(6) PM10 Redesignation**

The region will provide assistance and reviews as needed and appropriate.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch,  
e) Rules projects**

The Region will review and **provide timely** comment on draft rules and take rule making action when appropriate.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch,  
f) Outreach projects**

The Region will review and provide comments.

**D. OAQ- Branch Specific Priorities,  
4) Programs Branch,  
h) Northwest Indiana Diesel Initiative**

The Region will provide technical assistance as requested.

## Office of Pollution Prevention and Technical Assistance

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**B. OPPTA-Branch Specific Priorities,**

**1) Pollution Prevention Branch,**

**f) Continue to promote increased coordination between the....**

The Region will work with other stakeholders in the RCRA and Toxics Substances Control Act programs to address issues dealing with the recycling and disposal of electronic wastes.

**B. OPPTA - Branch Specific Priorities,**

**1) Pollution Prevention Branch,**

**e) Continue to mount active outreach and educational programs to further the ....**

**(4) Continue coordination of the Indiana Pollution Prevention Partners that includes:**

Region 5 will participate in the US Department of Defense P2 Partnership activities.

**B. OPPTA - Branch Specific Priorities,**

**4) Compliance Assistance Branch,**

**(g) Education and Outreach,**

**(2) Create sector specific compliance information,**

**(h) Metal Casting Industry**

The Region will work with IDEM on developing beneficial reuse of foundry sand.

## Office of Enforcement

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**Office of Enforcement,  
5) Initiate Strategic Enforcement Initiatives,  
(1) Air Program**

The Region will participate in enforcement conference calls where the status of air program enforcement actions is discussed and future actions are planned. Other joint Federal/State enforcement activities included are case development calls/meetings, negotiation planning, and trial preparation.

**Office of Enforcement,  
5) Initiate Strategic Enforcement Initiatives,  
(2) Hazardous Waste Program**

The Region will review with IDEM: a) new or revised Federal RCRA rules; b) new or revised strategic plans affecting hazardous waste; c) U.S. EPA's Hazardous Waste Civil Enforcement Response Policy and RCRA Civil Penalty Policy; e) U.S. EPA's computerized programs to determine financial status of RCRA regulated entities; f) U.S. EPA's sector, waste, or rule-specific enforcement strategies; and g) RCRA Info and other data management strategies.

The Region will assist IDEM in conducting financial analyses of a violator's claim of inability to pay for injunctive relief and /or monetary penalties in formal enforcement actions brought by the State of Indiana.

Issue enforcement responses to RCRA violations detected by the Region, or referred to the Region by IDEM, in accordance with U.S. EPA's Hazardous Waste Civil Enforcement Response Policy, U.S. EPA's RCRA Civil Penalty Policy, and relevant enforcement strategies.

**Office of Enforcement,  
5) Initiate Strategic Enforcement Initiatives,  
(3) Water Program**

Region 5 will continue to support IDEM by doing Federal enforcement of drinking water cases referred to the Region by IDEM.

## Quality Assurance (QA) and Quality Management Plans (QMP)

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### **VII. QUALITY ASSURANCE (QA) AND QUALITY MANAGEMENT PLANS (QMP)**

Region 5 GWDWB will assist IDEM in developing its quality system, and provide reviews and approvals of the Quality Management Plan and quality assurance activities on a periodic basis.

Region 5 GWDWB will periodically review the State's analytical laboratory capabilities and laboratory certification program which support Safe Drinking Water monitoring activities in the State.